

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	
)	
Sage Telecom Communications, LLC)	WC Docket No. 09-197
)	
)	
Petition for Limited Designation as)	
An Eligible Telecommunications)	
Carrier in Alabama, Connecticut, Delaware,)	
the District of Columbia, Florida,)	
New Hampshire, New York, North Carolina,)	
Tennessee, and Virginia)	
)	

**SAGE TELECOM COMMUNICATIONS, LLC
PETITION FOR LIMITED DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN ALABAMA, CONNECTICUT, DELAWARE,
THE DISTRICT OF COLUMBIA, FLORIDA, NEW HAMPSHIRE, NEW YORK,
NORTH CAROLINA, TENNESSEE, AND VIRGINIA**

Joseph P. Holop
Chief Operations Officer
Sage Telecom Communications, LLC
10440 N. Central Expressway, Suite 700
Dallas, TX 75231-2228
(213) 344-2010

Dated August 8, 2013

TABLE OF CONTENTS

	Page
I. SUMMARY.....	5
II. COMPANY OVERVIEW.....	5
III. COMMISSION HAS AUTHORITY TO GRANT ETC DESIGNATION	7
IV. SAGE MEETS THE REQUIREMENTS FOR ETC DESIGNATION UNDER SECTION 214(e) OF THE ACT AND SECTION 54.201(d) OF THE COMMISSION’S RULES.....	10
A. Sage is a Common Carrier.....	10
B. Sage Will Provide the Services Supported By the Federal Universal Service Throughout Its Designated Service Area.....	10
C. Sage Will Provide Service Throughout Its Designated Service Area.....	11
D. Sage Satisfies the Requirements for Conditional Forbearance From Facilities Requirement.....	12
E. ADVERTISE THE AVAILABILITY OF ITS LOW INCOME OFFERINGS.....	12
V. SAGE MEETS THE ADDITIONAL REQUIRMENTS FOR ETC DESIGNATION UNDER SECTION 54.202 OF THE COMMISSION’S RULES.....	13
A. Sage Will Comply With the Service Requirements Applicable to Lifeline Support.....	13
B. Ability to Function in Emergency Situation.....	14
C. Consumer Protection and Service Quality Standards.....	14
D. Financial and Technical Capability to Provide Lifeline Service.....	14
E. Lifeline Offerings Available to Low Income Consumers.....	15
F. Additional Steps to Prevent Waste, Fraud and Abuse.....	17
G. Compliance with Subscriber Eligibility and Re-Certification Procedures as required by the Lifeline Reform Order.....	20

VI.	THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING ETC STATUS TO SAGE...	27
VII.	ANTI-DRUG ABUSE CERTIFICATION.....	29
VIII.	CONCLUSION.....	29

EXHIBIT 1 – FCC Approved Compliance Plan

EXHIBIT 2 – State Commission Statements regarding Jurisdiction for
Wireless ETC Designation

EXHIBIT 3 – Designated Service Area

EXHIBIT 4 – Samples of Marketing Material

EXHIBIT 5 – Lifeline Certification and Re-Certification Forms

EXHIBIT 6 – CTIA Code

EXHIBIT 7 – Officer Affidavit

)	
In the matter of)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	
)	
Sage Telecom Communications, LLC)	WC Docket No. 09-197
)	
Petition for Limited Designation as)	
An Eligible Telecommunications)	
Carrier in Alabama, Connecticut, Delaware,)	
the District of Columbia, Florida,)	
New Hampshire, New York, North Carolina,)	
Tennessee, and Virginia)	
)	

4

I. SUMMARY

Sage Telecom Communications, LLC ("Sage") seeks designation as an eligible telecommunications carrier ("ETC"), pursuant to Section 214(e)(6) of the Communications Act of 1934, as Amended (the "Act") and Federal Communications Commission ("FCC" or "Commission") rules, for the limited purpose of providing wireless services supported by the Universal Service Fund's Lifeline program. Section 214(e)(6) permits the Commission to grant ETC designation in those states where the state has affirmatively stated an ETC Petitioner is not subject to state jurisdiction. The States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia and the District of Columbia all have stated they lack jurisdiction over wireless service providers and consequently, Commission review and approval of Sage's Petition is warranted.

As described in greater detail herein, Sage has satisfied all of the requirements for designation as an ETC and is committed to complying with all of the Commission's rules and requirements for ETCs providing Lifeline services. Grant of ETC status will be in the public interest as Sage's provision of Lifeline-supported services will further the Commission's goals of the Lifeline program by increasing the service options available to low income consumers. Further Sage's prepaid wireless services will provide an important source of high quality service with the benefits of mobile service. Low income consumers will have a stable contact method where traditional landline service is unavailable or not a viable option. Additionally, the prepaid nature of Sage's services permit consumers to anticipate and control their communication costs. Sage's Lifeline service offerings include a number of "free" minutes that are an invaluable resource for cash-strapped consumers and features such as voicemail that are

critical to those seeking employment. Designation of Sage as an ETC will provide consumers with a valuable alternative for obtaining telephone service and this competition should spur other service providers to improve their offerings to low income consumers.

II. COMPANY OVERVIEW

Sage is a Texas limited liability company having its principal place of business at 10400 N. Central Expressway, Suite 700, Dallas, Texas 75231. Sage provides wireless mobile phone services through resale of the wireless services of Sprint Spectrum. Sage has been designated as an ETC for wireless services in Texas, Kansas and Wisconsin. All of Sage's wireless offerings will have an activation fee and all plans will include the following custom calling features: Caller ID, 3-Way Calling, Call Waiting, and Voicemail. Subscribers are not bound by a local calling area requirement; all Sage plans come with domestic long distance at no extra per minute charge. None of Sage's plans allow roaming; none allow rollover of minutes of use. The majority of Sage's products and plans are specially geared toward lower income communities, and its service models and pricing plans reflect this business model. For prepaid services, Sage does not require contracts from its customers and it ensures competitive low pricing for its services and products. By providing affordable service, Sage can reach out to those who are often ignored by traditional carriers.

Sage manages and markets all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and live customer service. Sage's prepaid, budget-friendly pricing has given many low-income consumers the option of having basic mobile phone service without the burden of hidden costs, varying monthly charges, or

contractual commitments. Customers are able to customize their mobile phone service to suit their needs with Sage's pay-as-you-go mobile phone plans.

Sage's customers depend on and benefit greatly from Sage's inexpensive and flexible pricing model. Sage does not impose credit checks nor does it require a contract. In addition, most of Sage's customers turn to Sage because they cannot afford the services provided by traditional carriers. Sage affirmatively reaches out to the very low-income sector of the consumer base to offer attractive and affordable communications options. As such, Sage contributes to the expansion of wireless services for low-income consumers and intends to seek ETC designation in states and territories where it already has a strong customer base so that it may continue to expand the service options for low-income consumers.

III. COMMISSION HAS AUTHORITY TO GRANT ETC DESIGNATION

Section 214(e)(1) of the Act assigns state public utility commissions the authority to designate ETC status to most requesting entities. Section 214(e)(6) permits the FCC, rather than a state public utility commission, to designate a Petitioner as an ETC in cases involving a "common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission." The FCC has stated that before it will consider an ETC application, the entity seeking ETC status must demonstrate that it "is not subject to the jurisdiction of a state commission" and the entity must provide an "affirmative statement" from the relevant state commission that the carrier is not subject to the state commission's jurisdiction.

As demonstrated in the documents attached as Exhibit A, the public utility commission in each of the Initial ETC States has affirmatively stated that it lacks jurisdiction to designate ETC

status. Because the state public utility commissions in the Initial ETC States have specifically and affirmatively denied jurisdiction over CMRS providers for purposes of granting ETC status, Sage is not subject to state commission jurisdiction in any of the states for which it hereby seeks an ETC designation. The Commission therefore has jurisdiction to grant ETC status in these states pursuant to Section 214(e)(6) of the Act. Accordingly, FCC review and approval of the instant application is warranted. Sage submits copies of the following orders and correspondence:

The Alabama Public Service Commission issued an order finding that its “jurisdiction to grant Eligible Telecommunications Carrier status for universal service purposes does not extend to providers of cellular services, broadband personal communications services, and commercial radio services,” and that “wireless providers seeking ETC status should pursue their designation request with the FCC.”

The Connecticut Department of Public Utility Control provided a letter confirming that it lacks jurisdiction over wireless ETC petitions.

The Delaware Public Service Commission issued an order clarifying that as a “federal default state” it does not administer its own ETC program.

The District of Columbia confirmed by letter that it lacks jurisdiction to designate wireless carriers as ETCs.

The Florida Public Service Commission acknowledged by letter that “the revision to Chapter 364, Florida Statutes, changed the Commission’s jurisdiction regarding telecommunications companies.” The letter confirmed that “the Federal Communications

Commission, rather than this Commission is the appropriate agency to consider....for ETC status.”

The General Counsel of the New Hampshire Public Utilities Commission issued a letter confirming that the PUC lacks jurisdiction to consider petitions for ETC status filed by mobile radio communication carriers.

The New York Public Service Commission confirmed by letter that it lacks jurisdiction to entertain Boomerang’s ETC petition.

The North Carolina Utilities Commission released an Order concluding that “the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC.”

The Tennessee Regulatory Authority issued an order fining that its statutory “lack of jurisdiction over CMRS providers” precludes it from processing ETC petitions.

The Virginia State Corporation Commission issued an order stating that it “has not asserted jurisdiction over CMRS carriers” and that wireless ETC applicants “should apply to the Federal Communications Commission.”

In each of the above states, Sage requests that the Commission exercise its authority under Section 214(e)(6) and determine that it is not subject to a state commission’s ETC jurisdiction.

IV. SAGE MEETS THE REQUIREMENTS FOR ETC DESIGNATION UNDER SECTION 214(e) OF THE ACT AND SECTION 54.201(d) OF THE COMMISSION'S RULES

Section 54.202 of the Commission's rules outlines the requirements that must be met before a carrier can be designated as an ETC by the FCC. As discussed in further detail below, Sage meets these requirements and ETC designation in the Initial ETC States is warranted.

A. Sage is a common carrier.

Sage is providing interstate and foreign communications by radio and qualifies as a Commercial Mobile Radio Service ("CMRS") provider. Sage offers its mobile services on a common carrier basis. Further, section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers. Therefore, Sage is a common carrier.

B. Sage will Provide the Services Supported by the Federal Universal Service throughout Its Designated Service Area.

Sage seeks designation as an ETC to provide Lifeline only service in the service areas as defined by Exhibit 3. Sage will provide voice grade access to the public switched telephone network ("PSTN") through its agreement with Sprint. Sage's proposed Lifeline offerings will include varying rate plans with different amounts of voice/text usage available.

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who

obtain Lifeline-supported services. Sage's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Sage provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Sage also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Sage will transmit all 911 calls initiated from any of its handsets even if the associated has no remaining minutes.

In addition, all phones provided by Sage are 911/E911 compliant. Sage uses phones from Sprint that based on representations made to Sage by Sprint have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Sage will replace it with a compliant handset at no charge. All new customers who qualify Lifeline services with Sage will receive a 911/E911-compliant handset free of charge.

C. Sage will Provide Service Throughout Its Designated Service Area.

Sage will offer the services supported by federal universal service throughout its Designated Service Area. Sage's requested Designated Service Area is Sprint's wireless coverage area in the states of Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia, which will include a portion or the entirety of the study areas as identified in Exhibit 3.

D. Sage Satisfies the Requirements of Conditional Forbearance from the Facilities Requirement. Both the Act and the Commission's rules require a carrier seeking ETC designation to offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services. In the Lifeline Reform Order, however, the Commission decided to conditionally forbear from application of the Act's facilities requirement to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program. Specifically, the Commission determined that conditional forbearance from the facilities requirement would apply if the carrier: (1) complied with certain 911 requirements and (2) filed and received approval of a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in the Lifeline Reform Order as well as further safeguards against waste, fraud and abuse as the Wireline Competition Bureau may deem necessary. Sage certifies that it meets the requirements for conditional forbearance as demonstrated in its approved Compliance Plan, which is attached as Exhibit 1.

E. Advertise the Availability of Its Low Income Offerings.

Sage has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline customers. With respect to its wireless services, Sage will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Sage will also explain that Lifeline is government benefit program and willfully making false statements to obtain Lifeline benefits

may be punished by fine or imprisonment or result in being barred from the program. Sage has and will continue to clearly disclose its name (Sage) on all marketing materials.

Sage will advertise the availability of the supported services, and the corresponding rates and charges, in a manner designed to inform the general public within Texas. This advertising will occur through a combination of media channels, such as print advertisements, direct marketing, and the Internet. The Company's advertising will be targeted to low-income consumers; marketing materials will plainly and visibly make consumers aware of both the availability and price for Lifeline. An example of the marketing material is provided in Exhibit 4.

V. SAGE MEETS THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER SECTION 54.202 OF THE COMMISSION RULES

Section 54.202 of the Commission's rules contains certain additional requirements for a common carrier to be designated as an ETC. Sage certifies that it will comply with all applicable requirements related to receipt of low-income support, consistent with 47 C.F.R. 54.202.

A. Sage will Comply with the Service Requirements Applicable to Lifeline Support

Section 54.202 requires ETCs to (1) certify that will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the network unless the ETC is receiving only Lifeline support. In response to item (1), Sage certifies that it will comply with the applicable service requirements and regulations for Lifeline support. In response to item (2), Sage is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

B. Ability to Function in Emergency Situations

Sage has significant experience with emergency preparedness. Sage has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies. In addition, Sage's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain function during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also is subject to emergency preparedness and functionality requirements established by the FCC.

C. Consumer Protection and Service Quality Standards

Sage will comply with all applicable state and federal consumer protection and service quality standards. As an operating CLEC in Texas and many other states, Sage already is subject to states' consumer protection and service quality requirements. Sage's wireless Lifeline customers will receive the same quality service and the benefit of the same consumer protections. Sage also will comply with the CTIA's Consumer Code for Wireless Service as included in Exhibit 6.

D. Financial and Technical Capability to Provide Lifeline Service

As part of the Lifeline Reform Order, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules. Sage satisfies these criteria.

Sage has been in business since 1998, employs approximately 80 people, 95% of whom are located in Texas. Sage is certificated provider of competitive local exchange services in

Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Texas, and Wisconsin. Sage is also an authorized provider of interexchange service in Colorado, and is certificated to provide local service as a CLEC in Florida, Indiana, Kentucky, Montana, Nebraska, Nevada, New Mexico, North Carolina, North Dakota, Oregon, South Carolina, South Dakota, Utah, Washington, and Wyoming. Sage has been designated as an ETC for wireline service in Kansas, Oklahoma, Texas, and Wisconsin. Sage currently has wireline Lifeline customers in five states for which it is reimbursed through state and/or federal programs, depending upon the state and the consumer. In California, Sage receives support only from the California Public Utility Commission's ("CPUC") Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Less than 20% of Sage's customers receive a subsidy from a low income program.

Sage has not been subject to any enforcement action at the FCC or in any state utility regulatory commission. No ETC designations held by Sage have not been rescinded, revoked or terminated by the FCC, nor has any state taken such action with respect to Sage's ETC designation or its designation as eligible for support from a state universal service fund.

E. Lifeline Offerings Available to Low Income Consumers

Proposed Prepaid Offerings: Sage's prepaid wireless offerings will consist of three plans: Sage ValuMobile Basic, ValuMobile Plus, and ValuMobile Unlimited. Each of the plans will include a different level of minutes of use for voice/text. Each plan requires an activation fee of \$30.00 and includes a basic handset. Operator and Directory Assistance are charged at a rate of \$1.50 per call. International text are assessed a rate of \$0.20 each incoming and

outgoing international text. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

The Sage ValueMobile Basic will include up to 280 minutes of voice/text at a rate of \$14.00 per month. The price of the plan does not include the federal lifeline discount of \$9.25 for lifeline customers. Text messages are assessed as 3 minutes of use for each incoming and 3 minutes of use for each outgoing message. Extra voice, texts, and data can be purchased at a rate of \$0.05, \$0.15, and \$0.15 respectively.

The Sage ValuMobile Plus plan includes up to 500 minutes of voice/test at a rate of \$25.00 per month. The price of the plan does not include the federal lifeline discount of \$9.25 for a lifeline customer. Text message are assessed 2 minutes of use for each incoming and 2 minutes of use for each outgoing message. Extra texts and data minutes can be purchased at a rate of \$0.10. Extra voice minutes can be purchased at a rate of \$0.05 per minute.

The Sage ValuMobile Unlimited Plan includes unlimited voice and text. Extra Data minutes are assessed a charge of \$0.05 per kb. Picture Messages are assessed a rate of \$0.15 per message.

Proposed Postpaid Offerings: Sage is still determining the exact plans it will offer in the future. All plans will likely require a monthly payment by the customer. Sage commits to providing a minimum of 250 minutes per month for the \$9.25 subsidy. Each of the plans will include a different level of minutes of use for voice/text. Each plan requires an activation fee of \$30.00 and includes a basic handset. Calls to 911 emergency services are always free, regardless of service activation.

F. Additional Steps to Prevent Waste, Fraud, and Abuse

Sage fully understands and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. Sage derives less than a quarter of its revenue from Low Income service, and does offer a wireline low income service in a number of states both with and without an administrator. Nonetheless, Sage has focused its operations with a goal of focused growth, to be offered initially in Texas, and then into other states in which Sage is already a wireline ETC. This approach has allowed Sage to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates in Sage's Subscriber Base. At the time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Sage subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Sage can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state.

In addition, while it is anticipated that Sage and its affiliate, Telscope will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. Sage will not consider a wireless subscriber activated until the customer has chose a non-Lifeline service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this “prequalification guideline” prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer’s eligibility has been confirmed through verification or a Lifeline administrator. As such, Sage will not seek reimbursement for any wireless subscriber until the subscriber activates service and is approved by the Lifeline administrator or by Sage, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Sage receiving reimbursement for a customer who does not have an active handset. After the order is processed, Sage personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive activated handset.

As required by the Lifeline Reform Order, Sage has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Sage’s Lifeline service for 60 consecutive days. When consumers sign-up for Sage’s service, Sage will inform them about the usage requirement. If a Sage Lifeline customer’s account does not reflect any usage during any consecutive 60-day period, Sage will deactivate the customer’s Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases

minutes or an additional month of service to add to the subscriber's Lifeline service plan; (c) answers an incoming call from a party other than Sage, its agent or representative; or (d) responds to a direct contact from Sage and confirms that he or she wants to continue receiving the Lifeline service.

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Sage will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage. Sage will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Sage providing said notice.

Cooperate with Federal and State Regulators and Lifeline Administrators. Sage will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Sage will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Sage Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from

another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and

- Comply with federal and state audit requirements.

G. Compliance with Subscriber Eligibility and Re-Certification Procedures as required by the Lifeline Reform Order

Under the Lifeline Reform Order, ETCs must comply with the eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Sage must also comply with all certification and verification requirements for Lifeline eligibility established by states where Sage is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certification and annual certifications, Sage certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator, they are responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the

appropriate approval of a potential subscriber's eligibility for Lifeline, Sage will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Sage's history of providing Lifeline and non-Lifeline customers in wireline products, Sage's primary source of signing up Lifeline customers will be via telephone, although some customers may be signed up in person at temporary locations staffed by Sage employees. Visitors to Sage's website will be given information about the program but are required to contact Sage directly via telephone to complete the sign-up process. These callers speak to Sage employees who are specially trained on the Lifeline programs. Sage's customer services representatives will review income- and program-based requirements with applicants via telephone contact. During the initial sign up for service, Sage will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. The customer would only be given the Lifeline discount when they have satisfied the verification process, either through the state administrator or Sage's internal process. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for

confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Sage will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Sage will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Sage will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Section 54.409(a)(1) or (a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Sage will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Sage will inform the applicant that any information provided will be submitted to

USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Sage will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, Sage's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receive benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Sage will require all Lifeline applicants to certify, under penalty of perjury, that:

- The applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;

- The applicant has provided documentation to Sage that correctly and accurately confirms the subscriber's household income or participation in the above-listed program(s);
- The applicant will notify its carrier within thirty (30) days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Sage;
- If the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- If the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- The applicant acknowledges that the subscriber will be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- The applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;

- The information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- The applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- The applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not receive more than one Lifeline benefit and consenting to inclusion of that information into a Lifeline database.

A sample Sage Lifeline Certification Application is attached here to Exhibit 5.

This application is mailed by Sage to the customer for completion and is return to Sage for review and certification. All applications are reviewed by Sage employees. Should Sage engage sales agents to assist in signing up customers, those applications will also be reviewed by Sage employees to ensure the applicant's eligibility. This review includes a review to determine eligibility as well as a duplicate review process described below. Sage will make itself available as a direct point of contact with all Lifeline applicants. In addition, all Sage employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Sage cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Sage personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Sage will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Sage will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility. In addition, if the subscriber provides Sage with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to Sage within 30 days, the subscriber will be de-enrolled from the Lifeline program.

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certification, Sage will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Sage that a current subscriber did not re-certify, then Sage will comply with the de-enrollment requirements required by the FCC's rules. Sage will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Sage will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and

54.405(e)(4). Sage may complete the re-certification process on a rolling basis throughout the year. If Sage cannot determine on-going eligibility by accessing a qualifying database, Sage will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet. Alternatively, beginning in 2013, Sage may elect to have the USAC administer the annual self-certification process.

As part of the re-certification process, Sage will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Sage for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Sage will send a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.

VI. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING ETC STATUS TO SAGE.

The Commission's rules require that, before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest. In determining if the public interest showing has been met, the Commission considers the "benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering." In addition, the principal goal of the Lifeline program is to make affordable telecommunications services available to low-income consumers.

Similar to the Commission's findings justifying grant of ETC designation to other petitioners, designation of Sage as an ETC for Lifeline purposes will further the Commission's goals for the Lifeline program. Specifically, the Company will offer prepaid wireless services to

low-income consumers thereby increasing consumer choice and expanding the number of affordable telecommunications services available to low-income consumers. Further, grant of the application will provide consumers with access to high quality service and the benefits of a mobile service. The mobility of the service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or in order to secure jobs. Wireless service therefore offers a stable contact method where traditional landline service would be unavailable or not a viable option. Sage's prepaid wireless service (which includes Lifeline) is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long term contract issues. Many consumers are faced with making difficult choices about how to allocate and spend their limited resources. Further, Sage does not impose credit checks for Lifeline and prepaid services thereby providing an alternative for those low income consumers unable to obtain credit for post-paid services provided by traditional carriers.

Sage's prepaid mobile calling service packages provide low income consumers with a generous number of included, anytime minutes and services are an invaluable resource for cash-strapped consumers who may be seeking employment and need a means to contact potential employers. The packages are also useful for those consumers that need the ability to stay in touch with children or other family members while also providing the ability to contact 911 emergency services when needed. Sage's services will provide consumers with a valuable alternative for obtaining telephone service and this competition in turn could spur other service providers to improve their service options.

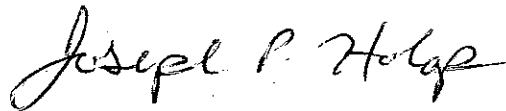
VII. ANTI-DRUG ABUSE CERTIFICATION

Sage certifies that no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862. A copy of a certification signed by Sage's COO is attached as Exhibit 7.

VIII. CONCLUSION

For the foregoing reasons, Sage asserts that grant of the instant Petition for Limited Designation as an Eligible Telecommunications Carrier is in the public interest and is warranted in accordance with 47 U.S.C. § 214(e)(6) of the Act. Accordingly, Sage respectfully requests approval of this application so that Sage can provide essential Lifeline wireless service to eligible low-income customers in Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph P. Holop". The signature is fluid and cursive, with the first name "Joseph" and last name "Holop" being clearly legible.

Joseph P. Holop
Chief Operations Officer
Sage Telecom Communications, LLC
10440 N. Central Expressway, Suite 700
Dallas, TX 75231-2228

Dated August 8, 2013

EXHIBIT 1

SAGE FCC COMPLIANCE PLAN



Take Action

Transact FCC.gov

Bureau-Approved Compliance Plans

- Airvoice Wireless, LLC
- American Broadband & Telecommunications
- AmeriMax Communications Corp.
- Birch Communications, Inc.
- Blue Jay Wireless, LLC
- Boomerang Wireless, LLC
- Budget PrePay, Inc.
- Consumer Cellular, Inc.
- Global Connection Inc. of America (Wireless)
- IM Telecom, LLC
- Millennium 2000 Inc.
- Nexus Communications, Inc.
- PlatinumTel Communications, LLC
- Q Link Wireless LLC
- Sage Telecom Communications, LLC
- TAG Mobile, LLC
- TerraCom, Inc. | [Exhibit 1](#) | [Exhibit 2](#) | [Exhibit 3](#) | [Exhibit 4](#)
- Telrite Corporation
- Telscape Communications, Inc.
- Total Call Mobile, Inc. | [Exhibit A-G](#)

Pending ETC Petitions

- Airvoice Wireless, LLC
- American Broadband and Telecommunications Company

BINGHAM

Douglas D. Orvis II
douglas.orvis@bingham.com

May 30, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Compliance Plan of Sage Telecom, Inc., WC Docket Nos. 09-197 and 11-42

ATTENTION: Chief, Telecommunications Access Policy Division, Wireline
Competition Bureau

Dear Ms. Dortch:

Sage Telecom, Inc. ("Sage"), through its attorneys, hereby notifies the Wireline Competition Bureau of several internal corporate changes that will affect the provision of Lifeline Service under Sage's Compliance Plan approved December 26, 2012. As part of this change, in the near future, Lifeline services will not be offered by Sage, but by a newly-created affiliated corporation called Sage Telecom Communications, LLC ("Sage, LLC"). Sage respectfully requests the Commission update its records regarding Sage's Compliance Plan and Lifeline services to reflect that such services are now provided by Sage, LLC.

Sage is a competitive local exchange carrier in 26 states and has been designated as an eligible telecommunications carriers ("ETC") in several states. In 2012, pursuant to the rules and procedures adopted in the *Lifeline Reform Order*,¹ Sage submitted a Compliance Plan to obtain a limited ETC designation to provide wireless Lifeline services. Sage's Compliance Plan was approved on December 26, 2012,² and Sage has initiated its Lifeline services for qualified low income consumers in certain service areas.

During the first quarter of 2013, Sage filed the necessary applications with the applicable state public utility commissions to obtain approval for a change in corporate structure.³

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, FCC 12-11 (2012) ("*Lifeline Reform Order*").

² *Wireline Competition Bureau Approves the Compliance Plans of Airvoice Wireless, et al.*, Public Notice, DA 12-2063 (rel. Dec. 26, 2013).

³ Commission rules require post-closing notification, which will be filed by Sage in the near future within the required time after the transaction closes.

Beijing
Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T +1.202.373.6000
F +1.202.373.6001
bingham.com

Ms. Marlene H. Dortch
May 30, 2013
Page 2

As further detailed in the attached corporate structure chart, the transaction will result in the services provided by Sage, including Lifeline services being provided by Sage, LLC. Certificates to provide telecommunications services are being moved from Sage to Sage, LLC by state commissions. Even though the technical entity has changed, the ultimate parent company remains the same, and the same management and executives remain in charge of policies and procedures. All other information about the company's services and policies as set forth in the Compliance Plan remain accurate. Sage, LLC will offer Lifeline services in accordance with the commitments originally made by Sage in the Compliance Plan.

The transaction will be completely transparent to consumers who will continue to receive the same services, including Lifeline services, under the same terms and conditions as they do now under the "Sage" trade name.

As such, in order to avoid consumer confusion and interruption to Lifeline services provided to low income consumers, Sage respectfully requests that the Bureau revise its records to reflect the Compliance Plan of Sage under the new entity. Ideally, to avoid confusion, the record would list "Sage Telecom Communications, LLC formerly Sage Telecom, Inc." as the entity with an approved Compliance Plan.

Please contact the undersigned with any questions about this matter.

Respectfully Submitted,

/s/

Douglas D. Orvis II
Kimberly A. Lacey

cc: Kim Scardino (via email)



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 12-2063

Release Date: December 26, 2012

**WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF
AIRVOICE WIRELESS, AMERIMEX COMMUNICATIONS, BLUE JAY WIRELESS,
MILLENNIUM 2000, NEXUS COMMUNICATIONS, PLATINUMTEL COMMUNICATIONS,
SAGE TELECOM, TELRITE AND TELSCAPE COMMUNICATIONS**

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of nine carriers: AirVoice Wireless, LLC (AirVoice); AmeriMex Communications Corp. (AmeriMex); Blue Jay Wireless, LLC (Blue Jay); Millennium 2000, Inc. (Millennium 2000); Nexus Communications, Inc. (Nexus); PlatinumTel Communications, LLC (PlatinumTel); Sage Telecom, Inc. (Sage); Telrite Corporation (Telrite); and Telscape Communications, Inc. d/b/a Telscape Wireless (Telscape). The compliance plans were filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.¹

The Act provides that in order to be designated as an eligible telecommunications carrier (ETC) for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services”² The Commission amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.³ As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by providing operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.⁴ In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement,

¹ See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816-17, paras. 379-380 (2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

² 47 U.S.C. § 214(e)(1)(A).

³ See *Lifeline Reform Order*, 27 FCC Rcd at 6678, para. 47; see also 47 C.F.R. § 54.101(a).

⁴ See *Lifeline Reform Order*, 27 FCC Rcd at 6812, para. 366, App. A; *Connect America Fund et al*, WC Docket 10-90, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*). Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC’s Third Amended Compliance Plan at 4 n. 2 (filed July 30, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under sections 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.⁵ Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁶

The Bureau has reviewed the nine plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order* and now approves those nine compliance plans.⁷

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Michelle Schaefer, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

- FCC -

⁵ See *Lifeline Reform Order*, 27 FCC Rcd at 6813-6817, paras. 368-381.

⁶ See *id.*, 27 FCC Rcd at 6814, 6819, paras. 373, 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

⁷ The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, 27 FCC Rcd at 6679-80, 6818-19, paras. 50, 387.

APPENDIX

Petitioner	Compliance Plans As Captioned by Petitioner	Date of Filing	Docket Numbers
AirVoice Wireless, LLC	AirVoice Wireless, LLC's Amended Compliance Plan	December 7, 2012	09-197; 11-42
AmeriMex Communications Corp.	AmeriMex Communications Corp. Revised Compliance Plan	December 6, 2012	09-197; 11-42
Blue Jay Wireless, LLC	Blue Jay Wireless, LLC Compliance Plan	November 30, 2012	09-197; 11-42
Millennium 2000 Inc.	Amended Compliance Plan of Millennium 2000 Inc.	December 18, 2012	09-197; 11-42
Nexus Communications, Inc.	Third Amended Compliance Plan of Nexus Communications, Inc.	December 4, 2012	09-197; 11-42
PlatinumTel Communications, LLC	PlatinumTel Communications LLC's Revised Compliance Plan	December 19, 2012	09-197; 11-42
Sage Telecom, Inc.	Revised Compliance Plan of Sage Telecom, Inc.	December 19, 2012	09-197; 11-42
Telrite Corporation	Telrite Corporation Compliance Plan	November 29, 2012	09-197; 11-42
Telscape Communications Inc. d/b/a Telscape Wireless	Revised Compliance Plan of Telscape Communications, Inc.	December 19, 2012	09-197; 11-42

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
)

Federal-State Joint Board on)
Universal Service)
)

WC Docket No. 09-197

Lifeline and Link Up Reform Modernization)
)
_____)

WC Docket No. 11-42

REVISED COMPLIANCE PLAN OF SAGE TELECOM, INC.

Sage Telecom, Inc. ("Sage"), by its attorneys, respectfully submits this Compliance Plan ("Plan") for the purposes of seeking federal Lifeline support for wireless service under the Universal Service Fund's Low Income Program.

In the *Lifeline Reform Order*,¹ the Commission adopted rules and procedures through which it instituted "blanket forbearance" from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireless Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

Therefore, Sage respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau *Public Notice* issued on

¹ *In the Matter of Lifeline and Link Up Reform and Modernization Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-12, ¶ 172 (rel. Feb. 6, 2012) ("*Lifeline Reform Order*").

February 29, 2012.² Sage seeks approval of this compliance plan only for the provision of Lifeline support to provide wireless services nationwide, as the company offers wireline service as a facilities-based carrier under the approval of state commissions. This Plan sets forth Sage's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, Sage provides the following information:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;

Sage is a Texas corporation with offices located at 10440 N Central Expressway, Suite 700, Dallas, TX 75231.³ The company began operations as a competitive local exchange carrier ("CLEC") providing traditional wireline service in 1998. Sage is authorized as a CLEC in 25 additional states and as an interexchange carrier in Colorado,⁴ and provides service in Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Texas and Wisconsin. Sage was authorized as an ETC in Texas in 2002, and Sage also a provider of high speed Internet services. Sage has also been designated as an ETC in a number of other states for the provisions of wireline service Lifeline service and currently has wireline Lifeline customers in five states for which it is reimbursed through state and/or federal programs, depending upon the state and the customer. Specifically, in California, Sage receives support only from the CPUC's Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Less than 20% of Sage's customers receive a subsidy from a low income

² Public Notice, Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, DA 12-314, (Rel. Feb. 29, 2012).

³ Due to a planned move of corporate offices, this address is effective after October 26, 2012.

⁴ Technically, the services provided by Sage in Texas are under the corporate entity Sage Telecom of Texas, LP, and services in all other states are provided by Sage Telecom, Inc. However, services are all offered to consumers under the trade name "Sage Telecom, Inc."

program. The company is planning to launch wireless service on a non-Lifeline basis, primarily in Texas, through an MVNO arrangement with Sprint. As the company would like to expand this offering to Lifeline customers, Sage seeks approval of a compliance plan to offer Lifeline service using this resold service.

Sage is wholly-owned by TSC Acquisition Corporation ("TSC"). TSC also owns Telscape Communications, Inc., A CLEC based in California that primarily serves customers in that state on both a wireline and wireless basis. Sage, through its common ownership with Telscape, has collective access to a broader market and combined subscriber growth. Sage is also affiliated with TruConnect Mobile, LLC ("TruConnect"), through partial common ownership. TruConnect is 40% owned by TSC, Sage's parent company as described above. TruConnect provides mobile broadband data services and does not provide any services supported by the low income program.

(b) detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission's rules;

As a long-time provider of wireline services, particularly in Texas, Sage has a proven record of technical and financial qualifications. The company provides facilities-based wireline service in numerous states and has sophisticated back-office, operational and support systems, which allows it to operate at lower costs and pass those savings on to its subscribers. As a carrier who has provided service for nearly 14 years, Sage possesses the financial viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Sage derives the majority of its revenue from the telecommunications services it provides to its customers. Sage does not and will not rely exclusively on the Universal Service

Fund ("USF") disbursements to operate, but rather relies on revenues it receives from providing non-Lifeline wireline (and soon wireless) service, the payment for service by Lifeline customers,⁵ as well as high-speed Internet services. In addition, Sage has not been subject to any type of enforcement action or ETC revocation proceeding by the FCC or any state utility regulatory commission.

Sage is working with Sprint Spectrum to resell Sprint's wireless services to non-Lifeline customers in Texas and elsewhere. As a Lifeline service provider, Sage would continue to work with Sprint, who provides the necessary network infrastructure and wireless facilities necessary for the operation of Sage's services as a Mobile Virtual Network Operator ("MVNO"). As the Commission is aware, Sprint is a large, nationwide carrier who provides similar service to other wireless Lifeline providers operating as MVNOs. Sage's agreement and partnership with Sprint further demonstrates its financial and technical capability to provide these services.

(c) detailed information, including geographic locations, of the carrier's current service offerings if the carrier currently offers service;

As detailed in response to Question 1(a) above, Sage currently provides local and interstate wireline and is planning to provide wireless services in numerous states, with a particular emphasis on Texas.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;

At this time, Sage plans to offer the following wireless Lifeline plans and services, subject to state specific requirements or requests from state PUCs. These plans are offered to both Lifeline and non-Lifeline subscribers, with a discount applied to the Lifeline customer. Services will be offered on a prepaid basis, and potentially also on a postpaid basis. All services

⁵ All of Sage's Lifeline wireline customers currently pay a monthly fee for the discounted service.

will normally have an activation fee and will likely require a monthly payment from the customer. The prices listed below show the basic, non-Lifeline price and the price to the consumer with the \$9.25 Lifeline credit applied. All plans will likely require a monthly payment by the customer. Sage commits to providing a minimum of 250 minutes per month for the \$9.25 subsidy.

Sage is still determining the exact plans it will offer (reiterating the condition that plans will provide a minimum of 250 minutes for the \$9.25 subsidy), but a sample plan would be as follows:

ValuMobile Plus Price: \$24.25 per month/Lifeline Price: \$15.00

Features	Cost
500 minutes Voice/Text	Included
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
VoiceMail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50

Activation Fee: \$25.00

Additional Minutes: For all service plans the customer can purchase additional voice, data, MMS, text minutes for \$0.05 per minute with a minimum purchase of \$5.00. For example, 100 additional minutes will cost \$5.00. The customer will have the ability to purchase 100 minutes (\$5.00); 200 minutes (\$10.00); 300 minutes (\$15.00) and 500 minutes (\$25.00). For Unlimited service plans the customer will not need additional voice or text but will need to purchase additional minutes for data and MMS. MMS is priced at \$0.15 per minute and Data is \$0.05 per MB.

Text Messages: The service plans include text messaging; text messaging rates are assessed at 1 minute per text message sent and 1 minute per text message received.

Other: Plans do not permit rollover minutes. Top Ups are available for a 30 day period as long as the customer renews the service at the normal plan rate. Plans do not allow roaming. The \$25.00 Activation Fee includes selection of a basic handset which is activated and provided ready for use. Customers are allowed to call internationally but will be assessed the international rates. International text rates are \$0.20 per minute for messages sent or received. Special Promotional offer: 10 MB data FREE for 3 months with the selection of a data capable phone.

(e) all other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers.

In response to item (1), Sage certifies that it will comply with applicable service requirements and regulations for Lifeline support.

In response to item (2), Sage is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

In response to item (3), as a CLEC provider in multiple states for over 14 years, Sage has significant experience with emergency preparedness. Sage has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies. In addition, Sage's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also remains subject to the Commission's authority and must, and does, comply with federal outage reporting requirements.

In response to item (4), Sage certifies that it will comply with the applicable consumer protection and service quality standards. As an operating CLEC in many states, Sage is already subject to states consumer protection and service quality requirements. Sage's wireless Lifeline customers will also receive the same quality service and protections.

Sage's response to items (5) and (6) are provided above and in the provided exhibits

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;

Under the *Lifeline Reform Order*, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Sage must also comply with all certification and verification requirements for Lifeline eligibility established by states where Sage is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, Sage certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Low Income Discount Administrator" or "LIDA" in Texas) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential subscriber's eligibility for Lifeline, Sage will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Sage's history of providing Lifeline and non-Lifeline customers in wireline products, Sage's primary source of signing up Lifeline customers will be via telephone, although some customers may be signed up in person at temporary locations staffed by Sage employees. Visitors to Sage's website will be given information about the program but are required to contact Sage directly via telephone to complete the sign-up process. These callers speak to Sage employees who are specially trained on the Lifeline programs. Sage's customer services representatives will review income- and program-based requirements with applicants via telephone contact. During the initial sign up for service, Sage will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. The customer would only be given the Lifeline discount when they have satisfied the verification process, either through the state administrator or Sage's internal process. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Sage will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Sage will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Sage will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or

(a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Sage will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Sage will inform the applicant that any information provided will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Sage will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, Sage's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Sage will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;
- the applicant has provided documentation to Sage that correctly and accurately confirms the subscriber's household income or participation in the above-listed program(s);
- the applicant will notify its carrier within thirty (30) days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Sage;
- if the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- if the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- the applicant acknowledges that the subscriber will be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not

receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample Sage application is attached hereto as Exhibit A.

This application is mailed by Sage to the customer for completion and is returned to Sage for review and certification. All applications are reviewed by Sage employees. Should Sage engage sales agents to assist in signing up customers, those applications will also be reviewed by Sage employees to ensure the applicant's eligibility.⁶ This review includes a review to determine eligibility as well as a duplicate review process described below. Sage will make itself available as a direct point of contact with all Lifeline applicants. In addition, all Sage employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Sage cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Sage personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Sage will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Sage will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.⁷ In addition, if the subscriber provides Sage with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Sage within 30 days, the subscriber will be de-enrolled from the Lifeline program.

⁶ In states with a Lifeline Administrator, this process would be handled pursuant to the procedures of the Administrator.

⁷ 47 C.F.R. §§ 54.410(b)(1)(ii)-(iii) and 54.410(c)(1)(ii)-(iii).

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, Sage will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Sage that a current subscriber did not re-certify, then Sage will comply with the de-enrollment requirements required by the FCC's rules. Sage will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Sage will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and 54.405(e)(4). Sage may complete the re-certification process on a rolling basis throughout the year. If Sage cannot determine on-going eligibility by accessing a qualifying database, Sage will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet.⁸ Alternatively, beginning in 2013, Sage may elect to have the USAC administer the annual self-certification process.⁹

As part of the re-certification process, Sage will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Sage for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Sage will send

⁸ *Lifeline Reform Order*, ¶ 130.

⁹ *Id.*, ¶ 133.

a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.¹⁰

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.¹¹ Sage's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Sage provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Sage also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Sage will transmit all 911 calls initiated from any of its handsets even if the associated account has no remaining minutes.

In addition, all phones provided by Sage are 911/E911 compliant. Sage uses phones from Sprint that, based on representations made to Sage by Sprint, have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Sage will replace it with a compliant handset at no charge. All new

¹⁰ 47 C.F.R. § 54.405(e)(4).

¹¹ *Lifeline Reform Order*, ¶ 373.

customers who qualify for Lifeline services with Sage will receive a 911/E911-compliant handset free of charge.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

Sage has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline to its customers. With respect to its wireless services, Sage will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Sage will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Sage has and will continue to clearly disclose its name (Sage or Sage Wireless) on all marketing materials. A sample advertisement to be used as a model for creation of state-specific advertisements is attached hereto as Exhibit B. Please note that the two pages of the exhibit represents the front and back of single page document.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

Sage fully understands and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. Sage derives less than a quarter of its revenue from Low Income service, and does offer a wireline low income service in a number of states both with and without and administrator. Nonetheless, Sage has focused its operations in a

few states, with a goal of focused growth, to be offered initially in Texas, and then into other states in which Sage is already a wireline ETC. This approach has allowed Sage to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates In Sage's Subscriber Base. At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Sage subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Sage can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state.

In addition, while it is anticipated that Sage and its affiliate, Telscape will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. Sage will not consider a wireless subscriber activated until the customer has chosen a *non-Lifeline* service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this "prequalification guideline" prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer's eligibility has been confirmed through verification or a Lifeline administrator. As such, Sage will not seek reimbursement for any wireless subscriber until the subscriber activates service and

is approved by the Lifeline administrator or by Sage, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Sage receiving reimbursement for a customer who does not have an active handset. After the order is processed, Sage personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive an activated handset.

As required by the *Lifeline Reform Order*, Sage has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Sage's Lifeline service for 60 consecutive days. When consumers sign-up for Sage's service, Sage will inform them about the usage requirement. If a Sage Lifeline customer's account does not reflect any usage during any consecutive 60-day period, Sage will deactivate the customer's Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases minutes or an additional month of service to add to the subscriber's Lifeline service plan; (c) answers an incoming call from a party other than Sage, its agent or representative; or (d) responds to a direct contact from Sage and confirms that he or she wants to continue receiving the Lifeline service.¹²

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Sage will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in

¹² See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

service termination for non-usage. Sage will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Sage providing said notice.¹³

Cooperate with Federal and State Regulators and Lifeline Administrators. Sage will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Sage will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Sage Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and
- Comply with federal and state audit requirements.

¹³ 47 C.F.R. § 54.405(e)(3).

CONCLUSION

Sage respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*. Accordingly, Sage respectfully requests approval of this Compliance Plan so that Sage can provide essential Lifeline wireless service to eligible low-income customers nationwide.

Respectfully submitted,

/s/ electronically signed

Douglas D. Orvis II
Kimberly A. Lacey
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006

Date: December 19, 2012

Exhibits

EXHIBIT A
CERTIFICATION FORMS



FEDERAL LIFELINE CERTIFICATION FORM

Lifeline Information

- Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers.
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

Lifeline Certification Instructions

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and Date of Birth.

Step 2. Indicate How You Qualify for Lifeline. Choose whether you participate in a qualifying program or if you household income falls within the guidelines. You **MUST** send photocopies demonstrating that you participate in the qualifying program or if you qualify based on your household income, you must provide documentation of income that covers one full year. Documentation that does not cover a full year, such as paystubs, the customer must present the same type of documentation covering Three Consecutive Months within the previous twelve months.

Step 3. Determine If You Qualify for Tribal Land. Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lands a customer must reside on Tribal Lands and participate in one of the following programs: Tribally Administered Free School Lunch Program, Tribally Administered Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, Head Start (those meeting income standard), and Bureau of Indian Affairs General Assistance.

Step 4. Certify Customer Eligibility. Each customer must certify, under penalty of perjury, for receiving Lifeline support, by initialing ALL areas under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Supporting Documentation. Don't forget that you must include supporting documentation which can include a copy of an award letter or card in the qualifying program based. Income documentation could include the prior year's state or federal tax return, paycheck stubs for the most recent 3 months, social security statement of benefits, child support document, retirement/pension statement of benefits, unemployment/workmen's compensation statement of benefits, Federal notice letter of participation in General Assistance, and other official document.

Step 7. Send the Certification Form. When completed, you may mail the form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228



FEDERAL LIFELINE CERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May **NOT** be a P.O. BOX): _____

☐ Please check this box if the above is a Temporary Address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Determine How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household who is receiving the benefits: _____

(#1). I qualify for Lifeline under **Program-Based Criteria** because I participate in the following program.

Check only **ONE** box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | |

(#2). I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: _____ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lands (If Applicable, Choose either #1 or #2)

My Tribal ID Number: _____ Check **ONE** box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I participate in the following tribally administered program.

- | | |
|---|---|
| <input type="checkbox"/> Tribally Administered Free School Lunch Program | <input type="checkbox"/> Tribally Administered Temporary Assistance for Need Families |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Head Start (those meeting income standard) |
| <input type="checkbox"/> Bureau of Indian Affairs General Assistance | |

Step 4. **CERTIFY APPLICANT'S ELIGIBILITY**

Please **Check** or **Initial All** the statements below to certify your eligibility.

I certify, under penalty of perjury, that:

- ____: I meet the income-based or program-based eligibility criteria.
- ____: I **must** notify Sage within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline support, I am receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- ____: When I move to a **new address**, I **must** provide that my new address to Sage within 30 days.
- ____: I acknowledge that a household is eligible to receive only **one** Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- ____: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- ____: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline benefits, is punishable by law.
- ____: I acknowledge that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify as to my continued eligibility will result in the de-enrollment and termination of my Lifeline benefits pursuant to the Code of Federal Regulation Section 54.405(e)(4).
- ____: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- ____: If I provided a temporary address, I will be required to verify my temporary address every 90 days.
- ____: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give consent to Sage to verify with the National Lifeline Accountability Database my eligibility in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Signature Printed Name Date

You may mail the completed Lifeline form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage Telecom, Inc.'s Use Only!

Lifeline Certification Approval / Denial _____ Service Order Provisioned By _____ Date _____

Supporting Documentation Provided _____



FEDERAL LIFELINE RECERTIFICATION FORM

Lifeline Information

- All Lifeline subscribers must annually recertify their continued eligibility in the Lifeline program.
- Lifeline is a Federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers (wireline or wireless).
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Failure to recertify will result in being de-enrolled from the program and loss of the Lifeline credits.

Instructions for Completing the Attached Lifeline Recertification Form

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and date of birth.

Step 2. Indicate How You Continue to Qualify for Lifeline. Choose whether you continue to participate in a qualifying program or if your annual household income remains at or below the income guidelines. Please choose Program-Based or Income-Based eligibility, but not both.

Step 3. Determine If You Continue to Qualify for Tribal Lifeline. (If Applicable) Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lifeline service, the applicant must reside on Federally recognized Tribal Land.

Step 4. Certify Customer Eligibility. Each applicant must certify, under penalty of perjury, to receive Lifeline service, by initialing or checking ALL items under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Send in the Certification Form. Upon completion, please mail the completed form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

All steps are required except Step 3 above for processing of your recertification form.

Please send the completed Lifeline Recertification Form to Sage within **30** days upon receipt.



FEDERAL LIFELINE RECERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May NOT be a P.O. BOX): _____

☐ Please check this box if the above address is a temporary address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Indicate How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household receiving the benefits: _____

(#1). I qualify for Lifeline under the **Program-Based Criteria** because I participate in the following program(s):

Check only **ONE** box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Low Income Heat Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | |

(#2). I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: _____ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lifeline (If Applicable, Choose either #1 or #2)

My Tribal ID Number is: _____ Check **ONE** box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I qualify for Tribal Lifeline service as I participate in the following tribally administered program.

- | | |
|---|--|
| <input type="checkbox"/> Tribally Admin Free School Lunch Program | <input type="checkbox"/> Tribally administered Temporary Assistance for Needy Families |
| <input type="checkbox"/> Head Start (those meeting income standards) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) | |

Step 4. CERTIFY APPLICANT'S ELIGIBILITY

Please **Check** or **Initial All** the statements below to certify your continued eligibility.

I certify, under penalty of perjury, that:

- ____ : I continue to meet either the income-based or program-based eligibility criteria.
- ____ : I must notify Sage within 30 days if, for any reason, I no longer satisfy the criteria for receiving Lifeline including, as applicable, if I no longer meet the income-based or program-based criteria, I am receiving more than one Lifeline service, or another member of my household is receiving a Lifeline service. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- ____ : When I move to a new address, I must provide my new address to Sage within 30 days.
- ____ : I know that my household is eligible to receive only one Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- ____ : The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- ____ : I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline service, is punishable by law.
- ____ : I understand that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify my continued eligibility will result in the de-enrollment and termination of my Lifeline service, pursuant to the Code of Federal Regulation 47 Section 54.405(e)(4).
- ____ : I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- ____ : If I provided temporary address, I will be required to verify my temporary address every 90 days.
- ____ : I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give my consent for Sage to verify with the National Lifeline Accountability Database whether I participate in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form

You must print your name and sign the certification form indicating you are complying with the Lifeline rules.

Signature

Printed Name

Date

You may mail the completed Lifeline form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage Telecom, Inc.'s Use Only!

Lifeline Recertification Approval / Denial _____ Service Order Provisioned By _____ Date _____

Lifeline Participating Program / Income Based Criteria _____

EXHIBIT B
SAMPLE MARKETING

Sage
TELECOMSM



CALL TODAY
866-674-6729

MAKE THE RIGHT CALL SWITCH TO SAGE TELECOM

- ✓ **No Contract**
- ✓ **No Credit Check**
- **500 ANYTIME MINUTES FOR ONLY \$15.00 PER MONTH***
- **GET AN AFFORDABLE MOBILE PHONE**

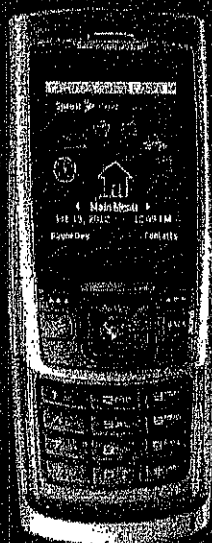
PLUS THIS BONUS:
SIGN UP FOR WIRELESS LIFELINE SERVICE AND
GET AN ADDITIONAL 100 MINUTES FREE!

SEE DETAILS ON BACK ►

Bling

WE'VE GOT A PLAN FOR YOU CALL TODAY 866-674-6729

We make it affordable for you to get low-cost talk and text through a government assistance program called Lifeline. Now you can keep in touch with your family and friends. Qualified customers simply prepay \$15.00 per month and get 500 anytime talk and text.



YOU GET A GREAT DEAL MORE INCLUDING:

- FREE Call Waiting
- FREE Caller ID
- FREE Voice Mail
- Nationwide Service

Don't wait. Call today 866-674-6729 to see if you qualify for Wireless Lifeline Service. Sage Telecom Sales Reps are available to take your call.

HOW TO GET THE DEAL

To qualify for amazing **Wireless Lifeline Service**, all you have to do is participate in one of the following:

- Medicaid
- Federal Public Housing Assistance (Section 8)
- Health Benefit Coverage under the Children's Health Insurance Plan (CHIP)
- Low Income Housing Energy Assistance (LIHEAP)
- Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- Tribal TANF
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- Food Distribution Program on Indian Reservations (FDPIR)

You may also qualify if your total household income is at or below the Federal Poverty Guideline.

*Lifeline is a government assistance program, this service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. Any person who knowingly makes false statements in order to obtain Lifeline service will be subject to fines or imprisonment or can be barred from the program. 500 minutes can be for either talk or text. Monthly standard rate of \$24.25 will apply until you are certified. Discounted monthly rate of \$15.00 will start upon approval of Federal Lifeline. Payment plans are available for the \$25.00 activation fee that includes selection of a basic mobile phone which is activated and provided ready for use. Mobile phone may be data enabled.

EXHIBIT 2

STATE COMMISSION STATEMENTS REGARDING JURISDICTION FOR WIRELESS ETC DESIGNATION



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P.O. BOX 991
MONTGOMERY, ALABAMA 36101-0991

JIM SULLIVAN, PRESIDENT
JAN COOK, ASSOCIATE COMMISSIONER
GEORGE C. WALLACE, JR., DEPUTY COMMISSIONER

WALTER L. THOMAS, JR.
SECRETARY

**PINE BELT CELLULAR, INC. and PINE
BELT PCS, INC.,**

Joint Petitioners

**PETITION: For ETC status and/or
clarification regarding the jurisdiction
of the Commission to grant ETC status
to wireless carriers.**

DOCKET U-4400

ORDER

BY THE COMMISSION:

In a joint pleading submitted on September 11, 2001, Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. (collectively referred to as "Pine Belt") each notified the Commission of their desire to be designated as universal service eligible telecommunications carriers ("ETCs") for purposes of providing wireless ETC service in certain of the non-rural Alabama wireline service territories of BellSouth Telecommunications, Inc. ("BellSouth") and Verizon South, Inc. ("Verizon"). The Pine Belt companies noted their affiliation with Pine Belt Telephone Company, a provider of wireline telephone service in rural Alabama, but clarified that they exclusively provide cellular telecommunications and personal communications (collectively referred to as "CMRS" or "wireless") services in their respective service areas in Alabama in accordance with licenses granted by the Federal Communications Commission ("FCC"). The pivotal issue raised in the joint pleading of Pine Belt companies is whether the Commission will assert jurisdiction in this matter given the wireless status of the Pine Belt companies.

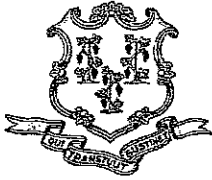
As noted in the filing of the Pine Belt companies, state Commissions have primary responsibility for the designation of eligible telecommunications carriers in their respective jurisdictions for universal service purposes pursuant to 47 USC §214(e). The Commission indeed established guidelines and requirements for attaining ETC status in this jurisdiction pursuant to notice issued on October 31, 1997.

DOCKET U-4400 - #2

For carriers not subject to state jurisdiction, however, §214(e)(6) of the Telecommunications Act of 1996 provides that the FCC shall, upon request, designate such carriers as ETCs in non-rural service territories if said carriers meet the requirements of §214(e)(1). In an FCC Public Notice released December 29, 1997 (FCC 97-419) entitled "Procedures for FCC designation of Eligible Telecommunications Carriers pursuant to §214(e)(6) of the Telecommunications Act", the FCC required each applicant seeking ETC designation from the FCC to provide, among other things, "a certification and brief statement of supporting facts demonstrating that the Petitioner is not subject to the jurisdiction of a state Commission."

The Pine Belt companies enclosed with their joint pleading completed ETC application forms as developed by the Commission. In the event the Commission determines that it does not have jurisdiction to act on the Pine Belt request for ETC status, however, the Pine Belt companies seek an affirmative written statement from the Commission indicating that the Commission lacks jurisdiction to grant them ETC status as wireless carriers.

The issue concerning the APSC's jurisdiction over providers of cellular services, broadband personal communications services, and commercial mobile radio services is one that was rather recently addressed by the Commission. The Commission indeed issued a Declaratory Ruling on March 2, 2000, in Docket 26414 which concluded that as the result of certain amendments to the Code of Alabama, 1975 §40-21-120(2) and (1)(e) effectuated in June of 1999, the APSC has no authority to regulate, in any respect, cellular services, broadband personal communications services and commercial mobile radio services in Alabama. Given the aforementioned conclusions by the Commission, it seems rather clear that the Commission has no jurisdiction to take action on the Application of the Pine Belt companies for ETC status in this jurisdiction. The Pine Belt companies and all other wireless providers seeking ETC status should pursue their ETC designation request with the FCC as provided by 47 USC §214(e)(6).



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

August 7, 2009

In reply, please refer to:

Docket No. 09-07-24:UR:PAP

L. Charles Keller, Esquire
Wilkinson Barker Knauer, LLP
2300 N Street, NW
Suite 700
Washington, DC 20037

Re: Docket No. 09-07-24 - Conexions LLC Seeks Designation as a Competitive Eligible Telecommunications Carrier

Dear Mr. Keller:

The Department of Public Utility Control (Department) acknowledges receipt of your July 10, 2009 letter filed on behalf of Conexions LLC (Conexions) seeking clarification as to whether the Department asserts jurisdiction to designate competitive eligible telecommunications carriers (CETC) in Connecticut. According to your letter, Conexions seeks designation as a CETC in Connecticut and believes that the Department does not assert jurisdiction to designate CETCs in the state and that carriers must apply to the FCC for certification.

The Department has reviewed your request and notes that it has approved requests for CETC status from wireline-based carriers. However, in the instant case, Conexions is a mobile virtual network operator. The Department does not regulate or license mobile carrier services' rates and charges and therefore, it is not subject to the Department's jurisdiction for the purposes of designating CETC status.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

A handwritten signature in cursive script, reading "K. Santopietro (xaw)".

Kimberley J. Santopietro
Executive Secretary



STATE OF DELAWARE
PUBLIC SERVICE COMMISSION
861 SILVER LAKE BOULEVARD
CANNON BUILDING, SUITE 100
DOVER, DELAWARE 19904

TELEPHONE: (302) 739 - 4247
FAX: (302) 739 - 4849

July 15, 2009

L. Charles Keller, Jr.
Wilkinson Barker Knauer, LLP
2300 N Street, NW, Ste. 700
Washington, DC 20037

RE: *Conexions LLC*

Dear Mr. Keller:

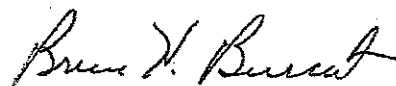
You have requested a statement confirming that the Delaware Public Service Commission ("PSC") lacks the jurisdiction to designate your client, Conexions, LLC ("Conexions"), as an Eligible Telecommunications Carrier ("ETC") under 47 U.S.C. § 214(e). You have represented that Conexions is a new mobile virtual network operator who seeks to participate in the FCC's Lifeline support program for qualifying low-income consumers.

Under state law, the Delaware PSC does not currently exercise any form of supervisory jurisdiction over wireless commercial mobile radio service ("CMRS") providers. *See* 26 *Del. C.* § 102(2) (excluding "telephone service provided by cellular technology, or by domestic public land mobile radio service" from the definition of "public utility"); 26 *Del. C.* § 202(c) (providing that the Delaware Commission has "no jurisdiction over the operation of domestic public land mobile radio service provided by cellular technology service or over rates to be charged for such service or over property, property rights, equipment of facilities employed in such service"). In fact, in granting ETC status in Delaware for Celco Partnership d/b/a Bell Atlantic Mobile, the FCC accepted the Delaware PSC's confirmation at that time that it did not have jurisdiction under state law to designate CMRS providers as ETCs. *See Federal-State Joint Board on Universal Service; Celco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier; Memorandum Opinion and Order*, 16 FCC Rcd. 39 (2000), at ¶¶ 3-4. There have been no changes to state law regarding the PSC's authority over CMRS providers since the *Celco* decision.

L. Charles Keller, Jr.
July 15, 2009
Page 2

I hope this addresses your request for confirmation that the Delaware Public Service Commission does not have jurisdiction under state law to designate CMRS providers, such as Conexions LLC, as an ETC.

Sincerely,

A handwritten signature in cursive script, reading "Bruce H. Burcat".

Bruce H. Burcat
Executive Director



Public Service Commission of the District of Columbia
1333 H Street, N.W., 2nd Floor, West Tower
Washington, D.C. 20005
(202) 626-5100
www.dcpssc.org

July 22, 2009

Via First Class and Certified Mail


Mr. L. Charles Keller
Counsel for Conexions, LLC.
Wilkinson Barker Knauer, LLP
2300 N Street, NW, Suite 700
Washington, DC 20037

Dear Mr. Keller:

Thank you for your July 10, 2009 letter stating Conexions, LLC's ("Conexions") intent to be designated as an eligible telecommunications carrier in the District of Columbia. As you are aware, the Public Service Commission of the District of Columbia ("Commission") does not have jurisdiction over wireless carriers operating in the District of Columbia, pursuant to section 34-2006(b) of the District of Columbia Code. Thus, the Commission has no authority to designate Conexions as an eligible telecommunications carrier in the District of Columbia.

Attached please find a copy of the relevant section of the District of Columbia Code for your information. Should you need anything further, please contact me at 202-626-5140 or rbeverly@psc.dc.gov.

Sincerely,

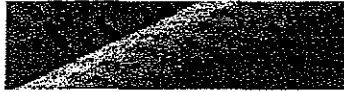

Richard A. Beverly
General Counsel

Enclosure



D.C. Council Home

Home Search Help ©



Welcome to the online source for the District of Columbia Official Code

DC ST § 34-2006
Formerly cited as DC ST 1981 § 43-1456

DC ST § 34-2006

Formerly cited as DC ST 1981 § 43-1456

District of Columbia Official Code 2001 Edition Currentness
Division V. Local Business Affairs

Title 34. Public Utilities. (Refs & Annos)

Subtitle V. Telecommunications.

Chapter 20. Telecommunications Competition. (Refs & Annos)

➤ § 34-2006. Exemptions.

(a) This chapter shall not apply to cable television services performed pursuant to an existing cable television franchise agreement with the District of Columbia which is in effect on September 9, 1996. To the extent that a cable television company seeks to provide local exchange services within the District of Columbia, such company shall be regulated under the provisions of this chapter for their local exchange services.

(b) Pursuant to the federal Telecommunications Act of 1996, this chapter shall not apply to licensed or unlicensed wireless services authorized by the Federal Communications Commission operating in the District of Columbia.

(c) This chapter shall not:

(1) Apply to the provision, rates, charges, or terms of service of Voice Over Internet Protocol Service or Internet Protocol-enabled Service;

(2) Alter the authority of the Commission to enforce the requirements as are otherwise provided for, or allowed by, federal law, including the collection of Telecommunications Relay Service fees and universal service fees;

(3) Alter the authority of the Office of Cable Television and Telecommunications with respect to the provision of video services in the District of Columbia; or

(4) Alter the Commission's existing authority over the regulation of circuit-switched local exchange services in the District of Columbia.

CREDIT(S)

(Sept. 9, 1996, D.C. Law 11-154, § 7, 43 DCR 3736; June 5, 2008, D.C. Law 17-165, § 3(c), 55 DCR 5171.)

HISTORICAL AND STATUTORY NOTES

Prior Codifications

1981 Ed., § 43-1456.

Effect of Amendments

D.C. Law 17-165 added subsec. (c).

Legislative History of Laws

For legislative history of D.C. Law 11-154, see Historical and Statutory Notes following § 34-2001.

For Law 17-165, see notes following § 34-403.

References in Text

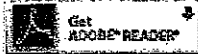
The federal Telecommunications Act of 1996, referred to in (b), is Pub. L. 104- 104, which is codified throughout Title 47 of the United States Code.

DC CODE § 34-2006

Current through June 17, 2009

Copyright © 2009 By The District of Columbia. All Rights Reserved.
END OF DOCUMENT

© 2009 Thomson Reuters/West. No Claim to Orig. U.S. Govt. Works.
Adobe Reader is required to view PDF images.



[Docs In Sequence](#)

Westlaw, part of Thomson Reuters
[© 2009 West](#) | [Privacy](#) | [Accessibility](#)



THOMSON REUTERS™

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO E. BALBIS
JULIE I. BROWN

STATE OF FLORIDA



GENERAL COUNSEL
S. CURTIS KISER
(850) 413-6199

Public Service Commission

June 2, 2011

Mr. Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 115
Alpharetta, GA 30005

Re: Docket No. 110101-TP – i-wireless, LLC's ETC designation

Dear Mr. Steinhart:

We received your May 20, 2011 letter requesting a statement that the Florida Public Service Commission's jurisdiction to grant ETC designation to i-wireless, LLC changed with Governor Scott's approval of HB 1231, the telecom reform bill. In your letter, you mentioned that i-wireless, LLC is a commercial mobile radio service provider.

This letter acknowledges that Governor Scott's approval of HB 1231, the telecom reform bill, revises Chapter 364, Florida Statutes, thereby changing the Commission's jurisdiction regarding telecommunications companies. I direct your attention to Chapter 364, Florida Statutes, including the revisions by HB 1231 for the proposition that the Federal Communications Commission, rather than this Commission is the appropriate agency to consider i-wireless, LLC's bid for ETC status.

Sincerely,

A handwritten signature in cursive script that reads "S. Curtis Kiser".

S. Curtis Kiser
General Counsel

cc: Beth W. Salak, Director, Division of Regulatory Analysis
Robert J. Casey, Public Utilities Supervisor, Division of Regulatory Analysis
Adam J. Teitzman, Attorney Supervisor, Office of the General Counsel
Ann Cole, Commission Clerk, Office of Commission Clerk

CHAIRMAN
Thomas B. Getz

COMMISSIONERS
Clifton C. Below
Amy L. Ignatius

EXECUTIVE DIRECTOR
AND SECRETARY
Debra A. Howland

THE STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

Tel. (603) 271-2431

FAX (603) 271-3878

TDD Access: Relay NH
1-800-735-2964

Website:
www.puc.nh.gov

September 22, 2009

L. Charles Keller
Wilkinson Barker Knauer, LLP
2300 N Street, NW
Suite 700
Washington, DC 20037

Re: Conexions, LLC

Dear Mr. Keller:

This is in response to your letter to the Commission, received July 10, 2009, concerning the above-referenced telecommunications carrier. You requested a statement from the Commission that Conexions, LLC (Conexions) is not subject to the jurisdiction of the Commission, inasmuch as this will affect how Conexions proceeds with efforts to become designated as an Eligible Telecommunications Carrier (ETC) for purposes of receiving universal service support pursuant to the federal Telecommunications Act.

You attention is directed to a published order of the Commission, *RCC Minnesota, Inc.*, 88 NH PUC 611 (2003) (Order No. 24,245). In that order, the Commission acknowledged that it lacks state-law authority to regulate wireless carriers, *id.* at 615, citing Section 362:6 of the New Hampshire Revised Statutes Annotated, and therefore the Commission concluded that the agency is likewise devoid of jurisdiction to consider a request for ETC designation from the carrier. In my judgment, Conexions as a user of both cellular and PCS (personal communications service) spectrum to provide commercial mobile radio service, may rely on the *RCC Minnesota* decision for the proposition that the Federal Communications Commission, as opposed to the New Hampshire Public Utilities Commission, is the appropriate agency to consider Conexions's bid for ETC status.

Please feel free to call me at 603-271-6005 if I can be of further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Anne Ross".

F. Anne Ross
General Counsel

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

GARRY A. BROWN

Chairman

PATRICIA L. ACAMPORA

MAUREEN F. HARRIS

ROBERT E. CURRY JR.

JAMES L. LAROCCA

Commissioners



PETER McGOWAN
General Counsel

JACLYN A. BRILLING
Secretary

September 1, 2009

L. Charles Keller
Wilkson Barker Knauer, LLP
2300 N Street, NW Suite 700
Washington, DC 20037

RE: Matter 09-01517/Case 09-C-0600 - Conexions LLC Request for Letter Clarifying
Jurisdiction over Wireless CETC

Dear Mr. Keller:

I am responding to your letter to Secretary Brilling, dated July 10, 2009 on behalf of Conexions LLC (Conexions). In your letter, you requested a statement that the State of New York does not exercise jurisdiction over Commercial Mobile Radio Service (CMRS) providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designation under 47 U.S.C. §214(e) and 47 C.F.R. §54.201 et seq. You indicated that Conexions is a mobile virtual network operator ("MVNO") seeking designation as a competitive eligible telecommunications carrier ("CETC") in New York.

In response to your request, please be advised that the New York State Public Service Law §5 provides that:

Applications of the provisions of this chapter [the Public Service Law] through one-way paging or two-way mobile radio telephone service with the exception of such services provided by means of cellular radio communication is suspended unless the [New York State Public Service] commission...makes a determination, after notice and hearing, that regulation of such services should be reinstituted to the extent found necessary to protect the public interest because of a lack of effective competition.

Mr. Keller

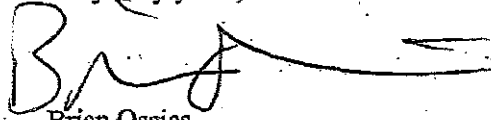
-2-

September 1, 2009

The New York State Public Service Commission has not made a determination that regulation should be reinstituted under Public Service Law §5. Consequently, based on the representation by Conexions that it is a mobile virtual network operator ("MVNO") provider, Conexions would not be subject to the application of the Public Service Law and therefore, the jurisdiction of the New York Public Service Commission for purposes of making the Eligible Telecommunications Carrier designation.

As this letter is responsive to your request for a statement, Matter 09-01517/Case 09-C-0600 will be closed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Ossias", with a long horizontal flourish extending to the right.

Brian Ossias
Assistant Counsel

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

GARRY A. BROWN
Chairman
PATRICIA L. ACAMPORA
MAUREEN F. HARRIS
ROBERT E. CURRY JR.
JAMES L. LAROCCA
Commissioners



PETER McGOWAN
General Counsel

JACLYN A. BRILLING
Secretary

August 13, 2009

L. Charles Keller
Wilkinson Barker Knauer LLP
2300 N Street, NW
Suite 700
Washington, DC 20037

Re: Case 09-C-0600 – Petition of Conexions LLC for a Declaratory Ruling
that the Company, a wireless telephone service provider, is not subject
to Commission jurisdiction

Dear Mr. Keller:

I am responding to your letter to Secretary Brilling, dated July 10, 2009, on behalf of Conexions LLC ("Conexions"). In your letter, you requested a statement that the State of New York does not exercise jurisdiction over wireless telephone service providers for purposes of making determinations concerning eligibility for Competitive Eligible Telecommunications Carrier designations under 47 USC §214(e) and 47 CFR §54.201 et seq. You indicated that Conexions is a mobile virtual network operator in several states, including New York.

In response to your request, please be advised that the New York State Public Service Law §5(3) provides that:

Application of the provisions of this chapter [the Public Service Law] to one-way paging or two-way mobile radio telephone service with the exception of such services provided by means of cellular radio communication is suspended unless the [New York Public Service] commission, . . . makes a determination, after notice and hearing, that regulation of such services should be reinstituted to the extent found necessary to protect the public interest because of a lack of effective competition.

In addition, the New York State Public Service Law §5(6)(a) provides that:

Application of the provisions of this chapter [the Public Service Law] to cellular telephone services is suspended unless the [New York Public Service] commission, . . . makes a determination, after notice and hearing, that suspension of the application of the provisions of this chapter shall cease to the extent found necessary to protect the public interest.

The New York State Public Service Commission has not made a determination that regulation should be reinstituted under Public Service Law §5. Consequently, based on the representation by Conexions that it is a wireless telephone service provider, Conexions would not be subject to the application of the Public Service Law and therefore, the jurisdiction of the New York Public Service Commission for the purposes of making the Competitive Eligible Telecommunication Carrier designation.

As this letter is responsive to your request for a statement, Case 09-C-0600 will be closed.

Sincerely,



Saul M. Abrams
Assistant Counsel

cc: Jaclyn A. Brilling, Secretary
Maureen Harris, Commissioner

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-100, SUB 133c

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Designation of Carriers Eligible for Universal)
Carrier Support) **ORDER GRANTING PETITION**

BY THE COMMISSION: On August 22, 2003, North Carolina RSAS Cellular Telephone Company, d/b/a Carolina West (Carolina West), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, Carolina West stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as Carolina West may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23)). Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, Carolina West has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that it should grant Carolina West's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status

for CMRS carriers. As noted above, in its August 28, 1995, Order in Docket Nos. P-100, Sub 114 and Sub 124, the Commission observed that G.S. 62-3(23), enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC. Accord., Order Granting Petition, ALLTEL Communications, Inc., June 24, 2003.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 28th day of August, 2003.

NORTH CAROLINA UTILITIES COMMISSION

Patricia Swenson

Patricia Swenson, Deputy Clerk

ptcc2003.01

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 11, 2003

IN RE:

APPLICATION OF ADVANTAGE CELLULAR
SYSTEMS, INC. TO BE DESIGNATED AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER

DOCKET NO.
02-01245

ORDER

This matter came before *Chairman Sara Kyle, Director Deborah Taylor Tate and Director Pat Miller* of the Tennessee Regulatory Authority (the "Authority"), the voting panel assigned in this docket, at the regularly scheduled Authority Conference held on January 27, 2003, for consideration of the *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier ("Application")* filed on November 21, 2002.

Background

Advantage Cellular Systems, Inc. ("Advantage") is a commercial mobile radio service provider ("CMRS") seeking designation as an Eligible Telecommunications Carrier ("ETC") by the Authority pursuant to 47 U.S.C. §§ 214 and 254. In its *Application*, Advantage asserts that it seeks ETC status for the entire study area of Dekalb Telephone Cooperative, Inc., a rural cooperative telephone company. Advantage maintains that it meets all the necessary requirements for ETC status and therefore is eligible to receive universal service support throughout its service area.

The January 27, 2003 Authority Conference

During the regularly scheduled Authority Conference on January 27, 2003, the panel of Directors assigned to this docket deliberated Advantage's *Application*. Of foremost consideration was the issue of the Authority's jurisdiction. The panel unanimously found that the Authority lacked

jurisdiction over Advantage for ETC designation purposes.¹

This conclusion was implicitly premised on Tenn. Code Ann. § 65-4-104, which provides that:

The Authority has general supervisory and regulatory power, jurisdiction and control over all public utilities and also over their property, property rights, facilities, and franchises, so far as may be necessary for the purpose of carrying out the provisions of this chapter.

For purposes of Tenn. Code Ann. § 65-4-104, the definition of public utilities specifically excludes, with certain exceptions not relevant to this case, "[a]ny individual, partnership, copartnership, association, corporation or joint stock company offering domestic public cellular radio telephone service authorized by the federal communications commission."

The Authority's lack of jurisdiction over CMRS providers implicates 47 U.S.C. § 214(e), which addresses the provision of universal service. Where common carriers seeking universal service support are not subject to a state regulatory commission's jurisdiction, 47 U.S.C. § 214(e)(6) authorizes the Federal Communications Commission ("FCC") to perform the ETC designation.²

¹ This finding is not inconsistent with the Authority's decision in *In re: Universal Service Generic Contested Case*, Docket 97-00888, *Interim Order on Phase I of Universal Service*, pp. 53-57 (May 20, 1998), in which the Authority required intrastate telecommunications carriers to contribute to the Intrastate Universal Service Fund including telecommunications carriers not subject to authority of the TRA. The decision in Docket No. 97-00888 was based primarily on 47 U.S.C. § 254(f) which authorizes states to adopt regulations not inconsistent with the Federal Communications Commission's rules on Universal Service and specifically requires every telecommunications carrier that provides intrastate telecommunications services to contribute to the preservation and advancement of universal service in that state. The *Interim Order* was issued prior to the effective date of 47 U.S.C. § 214(e)(6).

² 47 U.S.C. § 214(e)(6) states:

(6) Common carriers not subject to state commission jurisdiction:

In the case of a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission, the Commission shall upon request designate such a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the Commission consistent with applicable Federal and State law. Upon request and consistent with the public interest, convenience and necessity, the Commission may, with respect to an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated under this paragraph, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the Commission shall find that the designation is in the public interest.

As a matter of "state-federal comity," the FCC requires that carriers seeking ETC designation "first consult with the state commission to give the state commission an opportunity to interpret state law."³ Most carriers that are not subject to a state regulatory commission's jurisdiction seeking ETC designation must provide the FCC "with an affirmative statement from a court of competent jurisdiction or the state commission that it lacks jurisdiction to perform the designation."⁴


The panel noted that the FCC is the appropriate forum for Advantage to pursue ETC status pursuant to 47 U.S.C. § 214(e)(6). This Order shall serve as the above mentioned affirmative statement required by the FCC.

IT IS THEREFORE ORDERED THAT:

The Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier is dismissed for lack of subject matter jurisdiction.


Sam Kyle, Chairman


Deborah Taylor Tait, Director


Pat Miller, Director

³ *In the Matter of Federal-State Joint Bd. on Universal Service*, CC Docket No. 96-45, *Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, 15 F.C.C.R. 12208, 12264, ¶ 113 (June 30, 2000).

⁴ *See id.* (The "affirmative statement of the state commission may consist of any duly authorized letter, comment, or state commission order indicating that it lacks jurisdiction to perform designations over a particular carrier.")

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

AT RICHMOND, APRIL 9, 2002

COMMONWEALTH OF VIRGINIA, ex rel.¹

At the relation of the

STATE CORPORATION COMMISSION

CASE NO. PUC970135

Ex Parte, in re: Implementation
of Requirements of § 214(e) of the
Telecommunications Act of 1996

IN RE:

APPLICATION OF VIRGINIA CELLULAR LLC

CASE NO. PUC010263

For designation as an eligible
telecommunications provider under
47 U.S.C. § 214(e) (2)

ORDER

On September 15, 1997, the State Corporation Commission ("Commission") established the docket in Case No. PUC970135 to consider the requests of local exchange carriers ("LECs") to be designated as eligible telecommunications carriers ("ETC designation") to receive universal service support pursuant to § 214(e) of the Telecommunications Act of 1996, 47 U.S.C. § 251 et seq., ("Act") and associated Federal Regulations.¹ The Commission's exercise of its jurisdiction under § 214(e) (2) of the Act has been to establish a simple and streamlined process for telecommunications carriers to certify their eligibility with a minimum of regulatory burden placed upon each applicant.

¹ 47 C.F.R. § 54.201-207.

All Virginia carriers receiving an ETC designation have merely been required to file an affidavit which, among other matters, certifies that all requirements of the Act for designation are met.²

Until the above-captioned Application was filed in Case No. PUC010263 by Virginia Cellular LLC ("Virginia Cellular" or "Applicant") for ETC designation, these proceedings have been uncontested. This is the first application by a Commercial Mobile Radio Service ("CMRS") carrier for ETC designation.³ Pursuant to the Order Requesting Comments, Objections, or Requests for Hearing, issued by the Commission on January 24, 2002, the Virginia Telecommunications Industry Association ("VTIA") and NTELOS Telephone Inc. ("NTELOS") filed their respective comments and requests for hearing on February 20, 2002. Virginia Cellular filed Reply Comments on March 6, 2002.⁴

The comments of NTELOS and VTIA both contest the sufficiency of the Application and claim Virginia Cellular has

² See Order Issued November 21, 1997, in Case No. PUC970135, pp. 2-4 ("November 21, 1997, Order"). Also, the annual certification procedure to comply with 47 C.F.R. §§ 54.313 and 314 has been reduced to filing a form affidavit approved by the Commission in a Preliminary Order, issued August 29, 2001, in Case No. PUC010172.

³ Virginia Cellular is a CMRS carrier as defined in 47 U.S.C. § 153(27) and is authorized as the "A-band" cellular carrier for the Virginia 6 Rural Service Area, serving the counties of Rockingham, Augusta, Nelson, and Highland and the cities of Harrisonburg, Staunton, and Waynesboro.

⁴ On March 4, 2002, Virginia Cellular filed a Consent Motion requesting until March 6, 2002, to file Reply Comments. There being no objection, we now grant the Consent Motion.

failed to demonstrate how the public interest will be served.⁵ NTELOS and VTIA each allude in their comments to other expected applications for ETC designation by wireless and CLEC carriers to follow this case of first impression. For that reason, we are asked by VTIA and NTELOS to convene a hearing and establish certain standards for the provisioning of the nine services specified in 47 C.F.R. § 54.101.⁶ Each applicant is required to provide these nine services to be eligible for ETC designation.

VTIA further comments that "[i]t is not clear how the designation of Virginia Cellular as an ETC will affect the distribution of Universal Funds to the existing carriers in any given rural exchange area." Virginia Cellular replies that this "macroeconomic concern" need not be addressed with this Application. Rather, the Federal Communications Commission ("FCC") and the Federal State Joint Board on Universal Service

⁵ § 214(e) (2) of the Act requires that an ETC designation in areas served by a rural telephone company be based upon a finding that the designation is in the public interest. The Commission did recognize in its November 21, 1997, Order that any carrier seeking ETC designation in a rural area would have the burden of proving that such designation is in the public interest if challenged. Virginia Cellular is seeking ETC designation in the service territories of the following rural telephone companies: Shenandoah Telephone Company ("Shenandoah"), Clifton Forge Waynesboro Telephone Company ("NTELOS"), New Hope Telephone Company, North River Cooperative, Highland Telephone Cooperative, and Mountain Grove-Williamsville Telephone Company ("MGW").

⁶ The nine services required to be offered include: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation for qualifying low-income consumers. Also, the services must be advertised in appropriate media sources. See In Re: Federal-State Joint Board of Universal Service, Report and Order, CC Docket No. 96-45, ¶ 145 (May 8, 1997) ("Universal Service Report & Order").

are reported by Virginia Cellular to be conducting ongoing proceedings to ensure the solvency of the high-cost support fund.⁷ Presumably, VTIA views any public interest served by Virginia Cellular's ETC designation to depend upon whether there would be a consequent diminution of universal service funds.

Virginia Cellular cites the authority of § 214(e)(6) of the Act for this Commission to send Applicant to the FCC for ETC designation if this Commission declines to act on its Application.⁸ In its Reply Comments, Virginia Cellular reports that the "FCC has been actively processing ETC applications on behalf of states which have declined to exercise jurisdiction [over CMRS carriers]. Its internal processing time has been six months, and it has met that timeline in almost all of its proceedings [and] . . . most, if not all of the issues raised by the commenters have been previously addressed by the FCC in its prior orders involving applications for ETC status."⁹

The Commission finds that § 214(e)(6) of the Act is applicable to Virginia Cellular's Application as this Commission has not asserted jurisdiction over CMRS carriers and that the

⁷ Reply Comments at p. 5.

⁸ Pursuant to § 332(c)(3), 47 U.S.C. § 332(c)(3), state regulation of the entry of or the rates charged by any commercial mobile service or any private mobile service is preempted. The Commission has deregulated all Virginia radio common carriers and cellular mobile radio communications carriers. See Final Order issued October 23, 1995, Case No. PUC950062.

⁹ Reply Comments at p. 3.

Applicant should apply to the FCC for ETC designation.¹⁰ The Applicant points out that if Virginia Cellular is designated as an ETC carrier, then the Commission must redefine the service areas of NTELOS and Shenandoah, pursuant to 47 C.F.R.

§ 54.207(c).¹¹ The Applicant has indicated a willingness to propose a plan to redefine these companies' service areas and may submit such a plan with its application to the FCC for ETC designation.

If necessary, this Commission will participate with the FCC and Federal-State Joint Board in redefining the service areas of NTELOS and Shenandoah for "the purpose of determining universal service obligations and support mechanisms." (47 C.F.R.

§ 54.207(a))¹² Although the FCC will make the final determination on Virginia Cellular's requests, we need to leave this docket open in case there is additional action we must take with respect to defining the service areas of NTELOS and Shenandoah.¹³

¹⁰ The action is similar to that taken by the Commission in Case No. PUC010172 in its August 29, 2001, Order that required cooperatives to certify directly with the FCC.

¹¹ The Commission believes that the service area of MGW does not necessarily need to be redefined if Virginia Cellular is designated as an ETC in that territory. However, if the FCC determines otherwise, the Commission will consider additional action if necessary.

¹² Pursuant to 47 C.F.R. § 54.207(c), if the Applicant proposes to redefine these two companies' service areas, the FCC's procedures require the Commission's agreement on the definitions.

¹³ At this juncture, it is unclear whether the Commission will need to address the redefinitions once disaggregation plans are filed at the FCC pursuant to 47 C.F.R. § 54.315(a).

NOW UPON CONSIDERATION of all the pleadings of record and the applicable law, the Commission is of the opinion that Virginia Cellular should request the FCC to grant the requested ETC designation, pursuant to 47 U.S.C. § 214(e)(6).

Accordingly, IT IS ORDERED THAT Case No. PUC010263 will remain open for further order of the Commission.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to: all LECs certified in the Commonwealth of Virginia, as set out in Appendix A of this Order; David A. Lafuria, Esquire, Lukas Nace Gutierrez & Sachs, 1111 Nineteenth Street, N.W., Suite 1200, Washington, D.C. 20036; C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of Attorney General, 900 East Main Street, Second Floor, Richmond, Virginia 23219; William F. Caton, Acting Secretary, Federal Communications Commission, Office of the Secretary, 445 12th Street, S.W., Washington, D.C. 20554; and the Commission's Office of General Counsel and Division of Communications.

EXHIBIT 3

SAGE COMMUNICATIONS, LLC DESIGNATED SERVICE AREA BY WIRE CENTERS

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABVLALXA	Alabama	BRPTALMA	Alabama	FLRKALXA	Alabama
AHVLALXA	Alabama	BRTOLMA	Alabama	FLRLALXA	Alabama
ALBRALXA	Alabama	BRYNALXA	Alabama	FLRNALMA	Alabama
ALBSALMA	Alabama	BSMRALBP	Alabama	FLVLALXA	Alabama
ALCYALMT	Alabama	BSMRALBU	Alabama	FOLYALXA	Alabama
ALVLALMA	Alabama	BSMRALHT	Alabama	FOLYALXB	Alabama
ANTNALLE	Alabama	BSMRALMA	Alabama	FRDNALXA	Alabama
ANTNALMT	Alabama	BYMNALMA	Alabama	FRHMALXA	Alabama
ANTNALOX	Alabama	CALRALMA	Alabama	FRHPALMA	Alabama
ARABALXA	Alabama	CHBGALMA	Alabama	FTDPALMA	Alabama
ARITALXA	Alabama	CHLFALXA	Alabama	FTMRALXA	Alabama
ARMRALXA	Alabama	CHLSALMA	Alabama	FTMRALXB	Alabama
ARNYALXA	Alabama	CLANALMA	Alabama	FTPYALMA	Alabama
ASFRALXA	Alabama	CLMBALMA	Alabama	FWRVALXA	Alabama
ASLDALXA	Alabama	CLMNALJC	Alabama	FYFFALXA	Alabama
ATHNALER	Alabama	CLMNALMA	Alabama	FYTTALXA	Alabama
ATHNALMA	Alabama	CMPHALXA	Alabama	GDBAALXA	Alabama
ATMRALXA	Alabama	CNTMFLLE	Alabama	GDSDALHS	Alabama
ATTLALNM	Alabama	COVLALXA	Alabama	GDSDALMT	Alabama
AUBNALMA	Alabama	CRDVALMA	Alabama	GDSDALRD	Alabama
BLBTALXA	Alabama	CRHLALNM	Alabama	GDWRALMA	Alabama
BLFNALMA	Alabama	CRLDALMA	Alabama	GLDNALXA	Alabama
BNKSALXA	Alabama	CRTNALXA	Alabama	GLSHALXA	Alabama
BNSCALXA	Alabama	CSTLALXA	Alabama	GLSHALXB	Alabama
BOAZALMA	Alabama	CSVLALXA	Alabama	GNBOALMA	Alabama
BRHMALCH	Alabama	DCTRALMT	Alabama	GNVLALXA	Alabama
BRHMALCP	Alabama	DDVLALMA	Alabama	GORDALXA	Alabama
BRHMALEL	Alabama	DELTALXA	Alabama	GOVLALXA	Alabama
BRHMALEN	Alabama	DLVLALXA	Alabama	GRDLALNM	Alabama
BRHMALEW	Alabama	DMPLALMA	Alabama	GRGNALXA	Alabama
BRHMALFO	Alabama	DORAALMA	Alabama	GRLYALMA	Alabama
BRHMALFS	Alabama	DPISALXA	Alabama	GSHNALXA	Alabama
BRHMALHW	Alabama	DTHNALXA	Alabama	GTVLALNM	Alabama
BRHMALMT	Alabama	ECHOALXA	Alabama	GUINALXA	Alabama
BRHMALOM	Alabama	ELBTALXA	Alabama	GYVLALNM	Alabama
BRHMALOX	Alabama	ELBTALXB	Alabama	HDLDALXA	Alabama
BRHMALRC	Alabama	ELMTALXA	Alabama	HFLNALXA	Alabama
BRHMALTA	Alabama	ENTRALXA	Alabama	HGLYALXA	Alabama
BRHMALVA	Alabama	ETVLALXA	Alabama	HLVIALMA	Alabama
BRHMALWE	Alabama	EUFLALMA	Alabama	HLVLALXA	Alabama
BRHMALWL	Alabama	EUTWALBO	Alabama	HMTNALXA	Alabama
BRILALXA	Alabama	EUTWALMA	Alabama	HNGRALXA	Alabama
BRNDALXA	Alabama	EVRGALMA	Alabama	HNVIALLW	Alabama

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
HNVIAMT	Alabama	MOBLALAP	Alabama	PLCYALXA	Alabama
HNVIAPW	Alabama	MOBLALAZ	Alabama	PNSNALMA	Alabama
HNVIARW	Alabama	MOBLALBF	Alabama	PRSHALNM	Alabama
HNVIALUN	Alabama	MOBLALOS	Alabama	PRVLALMA	Alabama
HNVLALBR	Alabama	MOBLALPR	Alabama	RAMRALXA	Alabama
HNVLALNM	Alabama	MOBLALSA	Alabama	RBDLALXA	Alabama
HRTSALNM	Alabama	MOBLALSE	Alabama	RBDLALXB	Alabama
HRTSALPE	Alabama	MOBLALSF	Alabama	RCFRALXA	Alabama
HXFRALXA	Alabama	MOBLALSH	Alabama	RFRMALXA	Alabama
HYVLALXA	Alabama	MOBLALSK	Alabama	RGLDALXA	Alabama
HZGRALMA	Alabama	MOBLALTH	Alabama	RLVLALMA	Alabama
IRSEALXA	Alabama	MOLTALNM	Alabama	RNVLALXA	Alabama
JCVLALMA	Alabama	MRCYALXA	Alabama	RPTNALXA	Alabama
JMSNALXA	Alabama	MRLWALXA	Alabama	RRVLALMA	Alabama
JSPRALMT	Alabama	MSSYALXA	Alabama	SELMALMT	Alabama
KLLNALMA	Alabama	MTGMALDA	Alabama	SHFDALMT	Alabama
LECTALXA	Alabama	MTGMALMB	Alabama	SHWMALXA	Alabama
LEDSALXA	Alabama	MTGMALMT	Alabama	SLCMALXA	Alabama
LEDSALXB	Alabama	MTGMALNO	Alabama	SLGNALXA	Alabama
LGTNALMA	Alabama	MTVRALMA	Alabama	SMNLALXA	Alabama
LLLNALXA	Alabama	NAUVALXA	Alabama	SMNLALXB	Alabama
LLLNALXB	Alabama	NCTRALXA	Alabama	SNEDALXA	Alabama
LNCLALXA	Alabama	NTSLALXA	Alabama	SNRCALXA	Alabama
LNDLALXA	Alabama	NWBCALXA	Alabama	SPVLALXA	Alabama
LNDNALMA	Alabama	NWHPALXA	Alabama	SRDLALXA	Alabama
LSBGALXA	Alabama	NWMRALXA	Alabama	SYLCALMT	Alabama
LVTNALLA	Alabama	NWTNALXA	Alabama	THMTALXA	Alabama
LWBOALXA	Alabama	NWVIALXA	Alabama	THRSALXA	Alabama
LXLYALXA	Alabama	ODRGALXA	Alabama	TLDGALMA	Alabama
LXLYALXB	Alabama	ODVLALXA	Alabama	TLDGALRF	Alabama
LXTNALMA	Alabama	OHTCALMA	Alabama	TLLSALXA	Alabama
LYNNALXA	Alabama	ONNTALXA	Alabama	TROYALMA	Alabama
MARNALNM	Alabama	OPLKALMT	Alabama	TSCLALDH	Alabama
MCCLALXA	Alabama	ORBHALXA	Alabama	TSCLALMT	Alabama
MCKNALXA	Alabama	ORBHALXC	Alabama	TSCLALNO	Alabama
MDSNALNM	Alabama	ORBHALXD	Alabama	TSKGALMA	Alabama
MENTALXA	Alabama	ORVLALXA	Alabama	TSVLALXA	Alabama
MGSPALXA	Alabama	OZRKALXA	Alabama	TWCKALMA	Alabama
MLCYALXA	Alabama	PANLALXA	Alabama	UNSPALXA	Alabama
MLPTALXA	Alabama	PDMTALMA	Alabama	UNTWALNM	Alabama
MNFDALMA	Alabama	PHBLALXA	Alabama	URIHALXA	Alabama
MNTVALNM	Alabama	PHCYALFM	Alabama	VNCNALMA	Alabama
MNVLALXA	Alabama	PHCYALMA	Alabama	VYHDALXA	Alabama

<u>WC Code</u>	<u>State</u>
WBTNALNM	Alabama
WCBGALXA	Alabama
WLGVALXA	Alabama
WNFDALXA	Alabama
WRRRALNM	Alabama
WTMPALMA	Alabama
YORKALMA	Alabama

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
BLFDCT00	Connecticut	HNTNCT00	Connecticut	PTNMCT00	Connecticut
BLTCCT00	Connecticut	HRFRCT03	Connecticut	RDFDCT00	Connecticut
BRFDCT00	Connecticut	JWCYCT00	Connecticut	RDNGCT00	Connecticut
BRFRCT00	Connecticut	KENTCT00	Connecticut	RKVLCT00	Connecticut
BRLNCT00	Connecticut	LBNNCT00	Connecticut	SFFDCT00	Connecticut
BRPTCT01	Connecticut	LDYRCT00	Connecticut	SGTNCT00	Connecticut
BRPTCT03	Connecticut	LKVLCT00	Connecticut	SHRNCT00	Connecticut
BRSTCT00	Connecticut	LTFDCT00	Connecticut	SMBYCT00	Connecticut
BTHNCT00	Connecticut	LYMECT01	Connecticut	SMFRCT01	Connecticut
CHSHCT01	Connecticut	MDLBCT00	Connecticut	SMFRCT02	Connecticut
CLCHCT00	Connecticut	MDSNCT01	Connecticut	SOBYCT00	Connecticut
CLMACT00	Connecticut	MDSNCT02	Connecticut	SRFRCT00	Connecticut
CLTNCT00	Connecticut	MDTWCT00	Connecticut	STRSCT01	Connecticut
CNANCT00	Connecticut	MLFRCT00	Connecticut	STSPCT00	Connecticut
CNTNCT00	Connecticut	MNCHCT00	Connecticut	STTNCT00	Connecticut
CNTYCT00	Connecticut	MODSCT00	Connecticut	SYMRCT00	Connecticut
CRNWCT00	Connecticut	MRDNCT00	Connecticut	THSNCT00	Connecticut
CRWLCT00	Connecticut	MRLBCT00	Connecticut	THTNCT00	Connecticut
DARNCT00	Connecticut	MTVLCT00	Connecticut	TMBLCT00	Connecticut
DNBRCT00	Connecticut	MYSTCT00	Connecticut	TRTNCT00	Connecticut
DNSNCT00	Connecticut	NBFRCT00	Connecticut	UNVLCT00	Connecticut
DPRVCT00	Connecticut	NGTCCT00	Connecticut	WASHCT00	Connecticut
DRBYCT00	Connecticut	NHVNCT00	Connecticut	WDSTCT00	Connecticut
DRHMCT00	Connecticut	NINTCT00	Connecticut	WHFRCT01	Connecticut
EHRTCT01	Connecticut	NMFRCT00	Connecticut	WHFRCT02	Connecticut
EHRTCT02	Connecticut	NRFLCT00	Connecticut	WLCTCT00	Connecticut
EHTNCT00	Connecticut	NRWCCT00	Connecticut	WLFRCCT00	Connecticut
EHVNCT00	Connecticut	NRWLCT02	Connecticut	WLKSCT00	Connecticut
ENFDCT01	Connecticut	NRWLCT03	Connecticut	WLMNCT00	Connecticut
ENFDCT02	Connecticut	NWBRCT00	Connecticut	WLTOCT00	Connecticut
ESSXCT00	Connecticut	NWCNCT00	Connecticut	WNSDCT00	Connecticut
FRFDCT00	Connecticut	NWFLCT00	Connecticut	WNSTCT00	Connecticut
FRTNCT00	Connecticut	NWHNCT03	Connecticut	WPNGCT00	Connecticut
GLBYCT00	Connecticut	NWLNCT02	Connecticut	WSBKCT00	Connecticut
GNWCCTGN	Connecticut	NWNTCT00	Connecticut	WSHNCT00	Connecticut
GRNBCT00	Connecticut	NWTWCT00	Connecticut	WSPTCT00	Connecticut
GRTNCT00	Connecticut	OGNWCT00	Connecticut	WSTVCT00	Connecticut
GRTWCT00	Connecticut	OLSYCT00	Connecticut	WTFDCT00	Connecticut
GSHNCT00	Connecticut	ORNGCT00	Connecticut	WTRBCT00	Connecticut
GUFDCT00	Connecticut	PLFDCT00	Connecticut	WTTWCT00	Connecticut
HGNMCT00	Connecticut	PLVLCT00	Connecticut		
HMDNCT00	Connecticut	PRSPCT00	Connecticut		
HMPNCT00	Connecticut	PTLDCT00	Connecticut		

<u>WC Code</u>	<u>State</u>
WASHDCAC	D.C.
WASHDCBK	D.C.
WASHDCBN	D.C.
WASHDCCH	D.C.
WASHDCDN	D.C.
WASHDCDP	D.C.
WASHDCGG	D.C.
WASHDCGT	D.C.
WASHDCLC	D.C.
WASHDCMO	D.C.
WASHDCMT	D.C.
WASHDCSE	D.C.
WASHDCSW	D.C.
WASHDCWL	D.C.

<u>WC Code</u>	<u>State</u>
ANGLDEAN	Delaware
BGVLDEBG	Delaware
CMDNDECD	Delaware
DGBODEDG	Delaware
DLMRDEDM	Delaware
DOVRDEDV	Delaware
FETNDEFE	Delaware
FRDRDEFR	Delaware
GMBODEGB	Delaware
GNWDDEGN	Delaware
GRTWDEGR	Delaware
HCKSDEHC	Delaware
HLOKDEHL	Delaware
HRTLDEHL	Delaware
HRTNDEHA	Delaware
LARLDELRL	Delaware
LEWSDELW	Delaware
MDTWDEMT	Delaware
MLBODEMB	Delaware
MLFRDEMF	Delaware
MLTNDEML	Delaware
MSTNDEMA	Delaware
NWCSDENC	Delaware
NWRKDENB	Delaware
OCVWDEOC	Delaware
RHBHDERB	Delaware
SEFRDESF	Delaware
SLVLDESV	Delaware
SMYRDESM	Delaware
TLVLDETV	Delaware
WLMGDEPR	Delaware
WLMGDEWL	Delaware
WRHLDEWH	Delaware

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABDLFLXA	Florida	BYSHFLXA	Florida	DUNDFLXA	Florida
ALCHFLXA	Florida	CCBHFLAF	Florida	DWPKFLXA	Florida
ALFAFLXA	Florida	CCBHFLMA	Florida	DYBHFLFN	Florida
ALFRFLXA	Florida	CDKYFLMA	Florida	DYBHFLMA	Florida
ALSPFLXA	Florida	CFLDFLMA	Florida	DYBHFLOB	Florida
ALTRFLXA	Florida	CFVLFLXA	Florida	DYBHFLOS	Florida
ALVAFLXA	Florida	CHLKFLXA	Florida	DYBHFLPO	Florida
ANMRFLXA	Florida	CHPLFLJA	Florida	EGLLFLBG	Florida
APPKFLXA	Florida	CHSWFLXA	Florida	EGLLFLIH	Florida
ARCDFLXA	Florida	CHTHFLXA	Florida	ENWDFLXA	Florida
ARCHFLMA	Florida	CITRFLXA	Florida	EORNFLMA	Florida
ASTRFLXA	Florida	CLHNFLXA	Florida	ESTSFLXA	Florida
AVPKFLXA	Florida	CLMTFLXA	Florida	EVRGFLXA	Florida
BAKRFLXA	Florida	CLTNFLXA	Florida	FHSDFLXA	Florida
BARTFLXA	Florida	CLWRFLXA	Florida	FLBHFLMA	Florida
BAYUFLXA	Florida	CNSDFLXA	Florida	FLRHFLXA	Florida
BBPKFLXA	Florida	COCOFLMA	Florida	FMTNALMT	Florida
BCGRFLXA	Florida	COCOFLME	Florida	FRBHFLFP	Florida
BCRTFLBT	Florida	CPCRFLXA	Florida	FRPTFLXA	Florida
BCRTFLMA	Florida	CPCRFLXB	Florida	FRSTFLXA	Florida
BCRTFLSA	Florida	CPHZFLXA	Florida	FTGRFLMA	Florida
BGPIFLMA	Florida	CRCYFLXA	Florida	FTLDFLCR	Florida
BHPKFLXA	Florida	CRRVFLXA	Florida	FTLDFLCY	Florida
BKVLFLLJ	Florida	CRVWFLXA	Florida	FTLDFLJA	Florida
BLDWFLMA	Florida	CRWDFLXA	Florida	FTLDFLMR	Florida
BLGLFLMA	Florida	CSCYFLBA	Florida	FTLDFLOA	Florida
BLTWFLXA	Florida	CSLBFLXA	Florida	FTLDFLPL	Florida
BLVWFLXA	Florida	CTDLFLXA	Florida	FTLDFLSG	Florida
BNFYFLXA	Florida	CYGRFLXA	Florida	FTLDFLSU	Florida
BNNLFLMA	Florida	CYLKFLXA	Florida	FTLDFLWN	Florida
BNSPFLXA	Florida	CYLKFLXB	Florida	FTMBFLXA	Florida
BORAFLXA	Florida	DBRYFLDL	Florida	FTMDFLXA	Florida
BRBAFLXA	Florida	DBRYFLMA	Florida	FTMYFLXA	Florida
BRFRFLXA	Florida	DDCYFLXA	Florida	FTMYFLXB	Florida
BRJTFLXA	Florida	DELDFLMA	Florida	FTMYFLXC	Florida
BRKRFLXA	Florida	DESTFLXA	Florida	FTPRFLMA	Florida
BRNDFLXA	Florida	DFSPFLXA	Florida	FTWBFLXA	Florida
BRSNFLMA	Florida	DLBHFLKP	Florida	FTWBFLXB	Florida
BRTNFLXX	Florida	DLBHFLMA	Florida	FTWBFLXC	Florida
BSHNFLXA	Florida	DLSPFLMA	Florida	FTWHFLXA	Florida
BVHLFLXA	Florida	DNDNFLXA	Florida	GCSPFLCN	Florida
BWLGFLXA	Florida	DNLNFLWM	Florida	GCVLFLMA	Florida
BYBHFLMA	Florida	DRBHFLMA	Florida	GDRGFLXA	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
GENVFLMA	Florida	JAY FLMA	Florida	LKLDLFXE	Florida
GLBRFLMC	Florida	JCBHFLAB	Florida	LKLDFLXN	Florida
GLDLFLXA	Florida	JCBHFLMA	Florida	LKMRFLHE	Florida
GLGCFLXA	Florida	JCBHFLSP	Florida	LKPCFLXA	Florida
GLRDFLXA	Florida	JCVLFLAR	Florida	LKWFLFLXA	Florida
GNBOFLXA	Florida	JCVLFLBW	Florida	LKWFLFLXE	Florida
GNDYFLXA	Florida	JCVLFLCL	Florida	LLMNFLXA	Florida
GNVLFLXA	Florida	JCVLFLFC	Florida	LNLKFLXA	Florida
GNWDFLXA	Florida	JCVLFLIA	Florida	LRGOFLXA	Florida
GRETFLXA	Florida	JCVLFLJT	Florida	LRVLFLXA	Florida
GSVLFLMA	Florida	JCVLFLLF	Florida	LSBGFLXA	Florida
GSVLFLNW	Florida	JCVLFLNO	Florida	LUTZFLXA	Florida
GVLDFLXA	Florida	JCVLFLOW	Florida	LVOKFLXA	Florida
HAVNFLMA	Florida	JCVLFLRV	Florida	LWTYFLXA	Florida
HBSDFLMA	Florida	JCVLFLSJ	Florida	LYHNFLOH	Florida
HDSNFLXA	Florida	JCVLFLSM	Florida	MALNFLXA	Florida
HGLDFLXA	Florida	JCVLFLWC	Florida	MAYOFLXA	Florida
HGSPFLXA	Florida	JNGSFLXA	Florida	MCINFLXA	Florida
HLNVFLMA	Florida	JPTRFLMA	Florida	MCLNFLXA	Florida
HLRDFLXA	Florida	JSPRFLXA	Florida	MCNPFLMA	Florida
HLWDFLHA	Florida	KGLKFLXA	Florida	MDBGFLPM	Florida
HLWDFLMA	Florida	KNVLFLXA	Florida	MDSNFLXA	Florida
HLWDFLPE	Florida	KSSMFLXA	Florida	MIAMFLAE	Florida
HLWDFLWH	Florida	KSSMFLXB	Florida	MIAMFLAL	Florida
HMSPFLEXA	Florida	KSSMFLXC	Florida	MIAMFLAP	Florida
HMSTFLEA	Florida	KSSMFLXD	Florida	MIAMFLBA	Florida
HMSTFLHM	Florida	KYHGFLMA	Florida	MIAMFLBC	Florida
HMSTFLNA	Florida	KYLRFLLS	Florida	MIAMFLBR	Florida
HNCYFLXA	Florida	KYLRFLMA	Florida	MIAMFLCA	Florida
HNCYFLXN	Florida	KYSTFLXA	Florida	MIAMFLDB	Florida
HOWYFLXA	Florida	KYWSFLMA	Florida	MIAMFLFL	Florida
HSNGFLXA	Florida	LBLLFLXA	Florida	MIAMFLGR	Florida
HTISFLMA	Florida	LDLKFLXA	Florida	MIAMFLHL	Florida
HWTHFLMA	Florida	LEE FLXA	Florida	MIAMFLIC	Florida
HYPKFLXA	Florida	LGBKFLXA	Florida	MIAMFLKE	Florida
IMKLFLXA	Florida	LHACFLXA	Florida	MIAMFLME	Florida
INLKFLXA	Florida	LKALFLXA	Florida	MIAMFLNM	Florida
INRKFLXX	Florida	LKBNFLXB	Florida	MIAMFLNS	Florida
INTRFLXA	Florida	LKBRFLXA	Florida	MIAMFLOL	Florida
INTWFLXA	Florida	LKBTFLXA	Florida	MIAMFLPB	Florida
INVRFLXA	Florida	LKCYFLMA	Florida	MIAMFLPL	Florida
IONAFLXA	Florida	LKHLFLXA	Florida	MIAMFLRR	Florida
ISLMFLMA	Florida	LKLDLFLXA	Florida	MIAMFLSH	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MIAMFLSO	Florida	OCALFLXC	Florida	PNSCFLBL	Florida
MIAMFLWD	Florida	OCALFLXJ	Florida	PNSCFLFP	Florida
MIAMFLWM	Florida	OCNFFLXA	Florida	PNSCFLHC	Florida
MICCFLLB	Florida	OKCBFLXA	Florida	PNSCFLPB	Florida
MLBRFLMA	Florida	OKHLFLMA	Florida	PNSCFLWA	Florida
MLBYFLXA	Florida	OKLWFLXA	Florida	PNVDFLMA	Florida
MLRSFLXA	Florida	OLDSFLXA	Florida	POINFLXA	Florida
MLTNFLRA	Florida	OLTWFLLN	Florida	PRRNFLMA	Florida
MNDRFLAV	Florida	ORCYFLXA	Florida	PRRYFLXA	Florida
MNDRFLLO	Florida	ORCYFLXC	Florida	PRSHFLXA	Florida
MNDRFLW	Florida	ORLDFLAP	Florida	PRSNFLFD	Florida
MNLKFLXA	Florida	ORLDFLCL	Florida	PSDNFLXA	Florida
MNSNFLMA	Florida	ORLDFLMA	Florida	PTCTFLXA	Florida
MNTIFLXA	Florida	ORLDFLPC	Florida	PTCYFLXA	Florida
MOISFLXA	Florida	ORLDFLPH	Florida	PTSJFLXA	Florida
MOLNFLXA	Florida	ORLDFLSA	Florida	PTSLFLMA	Florida
MRDCFLXA	Florida	ORPKFLMA	Florida	PTSLFLSO	Florida
MRHNFLXA	Florida	ORPKFLRW	Florida	QNCYFLXA	Florida
MRNNFLXA	Florida	ORSPFLXA	Florida	RAFRFLXA	Florida
MRTFLVE	Florida	OSPRFLXA	Florida	RSKNFLXA	Florida
MTDRFLXA	Florida	OVIDFLCA	Florida	RYHLFLXA	Florida
MTLDFLXA	Florida	PACEFLPV	Florida	SARKFLXA	Florida
MTVRFLXA	Florida	PAHKFLMA	Florida	SBNGFLXA	Florida
MXVLFLMA	Florida	PANCFLXA	Florida	SBSTFLFE	Florida
MYCYFLXA	Florida	PCBHFLNT	Florida	SBSTFLMA	Florida
NDADFLAC	Florida	PKCYFLXA	Florida	SCPKFLXA	Florida
NDADFLBR	Florida	PLCSFLMA	Florida	SEKYFLXA	Florida
NDADFLGG	Florida	PLMTFLXA	Florida	SGBEFLXA	Florida
NDADFLOL	Florida	PLSLFLXA	Florida	SGBHFLXA	Florida
NFMYFLXA	Florida	PLTKFLMA	Florida	SGKYFLMA	Florida
NFMYFLXB	Florida	PMBHFLCS	Florida	SHLMFLXA	Florida
NGBHFLXA	Florida	PMBHFLFE	Florida	SKWYFLXA	Florida
NKLRFLMA	Florida	PMBHFLMA	Florida	SLHLFLXA	Florida
NNPLFLXA	Florida	PMBHFLNP	Florida	SLSPFLXA	Florida
NPLSFLXC	Florida	PMBHFLTA	Florida	SMNLFLXA	Florida
NPLSFLXD	Florida	PMPKFLMA	Florida	SNANFLXA	Florida
NPRCFLXA	Florida	PNCRFLXA	Florida	SNDSFLXA	Florida
NRPTFLXA	Florida	PNCYFLCA	Florida	SNFRFLMA	Florida
NRSDFLXA	Florida	PNCYFLMA	Florida	SNISFLXA	Florida
NSBHFLMA	Florida	PNGRFLXA	Florida	SNRSFLXA	Florida
NWBYFLMA	Florida	PNISFLXA	Florida	SNSNFLXA	Florida
OCALFLXA	Florida	PNLNFLXA	Florida	SNSPFLXA	Florida
OCALFLXB	Florida	PNLSFLXA	Florida	SPBGFLXA	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
SPBGFLXS	Florida	VLPRFLXB	Florida
SPCPFLXA	Florida	VRBHFLBE	Florida
SPRGFLXA	Florida	VRBHFLMA	Florida
SRSTFLXA	Florida	WALDFLXA	Florida
SSDSFLXA	Florida	WCHFLXA	Florida
SSPRFLXA	Florida	WELKFLMA	Florida
STAGFLBS	Florida	WHSPFLXA	Florida
STAGFLMA	Florida	WIMMFLXA	Florida
STAGFLSH	Florida	WLBRFLXA	Florida
STAGFLWG	Florida	WLCHFLXA	Florida
STCDFLXA	Florida	WLCRFLXA	Florida
STGRFLXA	Florida	WLHLFLXA	Florida
STMKFLXA	Florida	WLSTFLXA	Florida
STRKFLXA	Florida	WLWDFLXA	Florida
STRTLMA	Florida	WNDRFLXA	Florida
SVSPFLXA	Florida	WNGRFLXA	Florida
SVSSFLXA	Florida	WNHNFLXC	Florida
SWTHFLXA	Florida	WNPKFLXA	Florida
SYHSFLCC	Florida	WPBHFLAN	Florida
TAFBFLXA	Florida	WPBHFLGA	Florida
TAMPFLXE	Florida	WPBHFLGR	Florida
TAMPFLXX	Florida	WPBHFLHH	Florida
THNTFLXA	Florida	WPBHFLLE	Florida
TLCHFLXA	Florida	WPBHFLRB	Florida
TLHSFLXA	Florida	WPBHFLRP	Florida
TLHSFLXB	Florida	WSSDFLXA	Florida
TLHSFLXC	Florida	WSTVFLXA	Florida
TLHSFLXD	Florida	WWSPFLHI	Florida
TLHSFLXE	Florida	WWSPFLSH	Florida
TLHSFLXF	Florida	YBCTFLXA	Florida
TLHSFLXG	Florida	YNFNFLMA	Florida
TLHSFLXH	Florida	YNTWFLMA	Florida
TMTRFLXA	Florida	YULEFLMA	Florida
TRENFLMA	Florida	ZLSPFLXA	Florida
TRSPFLXA	Florida		
TTVLFLMA	Florida		
TVRSFLXA	Florida		
UMTLFLXA	Florida		
UNVRFLXA	Florida		
VENCFLXA	Florida		
VENCFLXS	Florida		
VERNFLMA	Florida		
VLPRFLXA	Florida		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ZPHYFLXA	North Carolina	BRWYNCXA	North Carolina	CNTNNCMA	North Carolina
ABBGNCXA	North Carolina	BSCYNCMA	North Carolina	CNVLNCXA	North Carolina
ABRDNCXA	North Carolina	BSLKNCXA	North Carolina	COHRNCXA	North Carolina
ACMENCMA	North Carolina	BUFTNCXA	North Carolina	COLMNCXA	North Carolina
ADVNNCXA	North Carolina	BURLNCDA	North Carolina	CPHLNCRO	North Carolina
AHVLNCBI	North Carolina	BURLNCEL	North Carolina	CRBHNCCE	North Carolina
AHVLNCOH	North Carolina	BURLNCHA	North Carolina	CRDMNCXA	North Carolina
AHVLNCOT	North Carolina	BYBONCXA	North Carolina	CRDMNCXM	North Carolina
ALBMNCXA	North Carolina	CARYNCCE	North Carolina	CRLNNCMA	North Carolina
ALTNNCXA	North Carolina	CARYNCWS	North Carolina	CRTHNCXA	North Carolina
ANGRNCXA	North Carolina	CETNNCXA	North Carolina	CRTYNCXA	North Carolina
APEXNCCE	North Carolina	CHDBNCXA	North Carolina	CSHRNCXA	North Carolina
ARDNNCCE	North Carolina	CHGVNCXA	North Carolina	CSHYNCMA	North Carolina
ASBONCXA	North Carolina	CHLDNCXA	North Carolina	CTWBNCXA	North Carolina
ASBONCXB	North Carolina	CHMPNCAA	North Carolina	CYTNNCXA	North Carolina
ASVLNCXA	North Carolina	CHRKNCXB	North Carolina	DBSNNCXB	North Carolina
ATSNNCMA	North Carolina	CHRLNCBO	North Carolina	DNBRNCXA	North Carolina
AYDNNCXA	North Carolina	CHRLNCCA	North Carolina	DNTNNCXA	North Carolina
BADNNCXA	North Carolina	CHRLNCCE	North Carolina	DNVRNCMA	North Carolina
BALYNCXA	North Carolina	CHRLNCCR	North Carolina	DRHMNCXA	North Carolina
BCMTNCCE	North Carolina	CHRLNCDE	North Carolina	DRHMNCXB	North Carolina
BDLKNCXA	North Carolina	CHRLNCER	North Carolina	DRHMNCXC	North Carolina
BDVLNCXA	North Carolina	CHRLNCLP	North Carolina	DRHMNCXD	North Carolina
BELHNCXA	North Carolina	CHRLNCMI	North Carolina	DRHMNCXE	North Carolina
BEMTNCXA	North Carolina	CHRLNCOD	North Carolina	DRHMNCXG	North Carolina
BEVLNCXA	North Carolina	CHRLNCRE	North Carolina	DRHMNCXH	North Carolina
BHLHNCXA	North Carolina	CHRLNCSH	North Carolina	DRHMNCXM	North Carolina
BISCNCXA	North Carolina	CHRLNCTH	North Carolina	DRHMNCXT	North Carolina
BLDWNCXA	North Carolina	CHRLNCUN	North Carolina	DRPRNCXA	North Carolina
BLMTNCCE	North Carolina	CHVLNCCE	North Carolina	DUNNNCXA	North Carolina
BLRKNCCE	North Carolina	CKTNNCXA	North Carolina	DVSNNCPO	North Carolina
BNELNCXA	North Carolina	CLEVNCMA	North Carolina	EBNDNCXA	North Carolina
BNSNNCXA	North Carolina	CLMBNCXA	North Carolina	EDENNCXB	North Carolina
BNVLNCXA	North Carolina	CLMTNCMA	North Carolina	EDTNNCXA	North Carolina
BOLVNCXA	North Carolina	CLNGNCXA	North Carolina	ELBONCMA	North Carolina
BOMRNCXA	North Carolina	CLRGNCXA	North Carolina	ELCYNCXA	North Carolina
BONLNCXA	North Carolina	CLRNNCXA	North Carolina	ELKNNCXA	North Carolina
BOONNCKI	North Carolina	CLTNNCXA	North Carolina	ELRBNCXA	North Carolina
BRCYNCXA	North Carolina	CLWHNCXA	North Carolina	EMCYNCXA	North Carolina
BRGWNCMA	North Carolina	CLYDNCMA	North Carolina	ENFDNCXA	North Carolina
BRKSNCXA	North Carolina	CNCRNCXA	North Carolina	ENKANCMA	North Carolina
BRVLNCXA	North Carolina	CNDRNCXA	North Carolina	FAMTNCMA	North Carolina
BRVRNCXA	North Carolina	CNJCNCXA	North Carolina	FASNNCXA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
FKTNNCXA	North Carolina	HCKRNCXB	North Carolina	KNPLNCXA	North Carolina
FONTNCXA	North Carolina	HGHFNCXA	North Carolina	KNVLNCXA	North Carolina
FQVRNCXA	North Carolina	HGPNNCXA	North Carolina	KRVLNCXA	North Carolina
FRBSNCXB	North Carolina	HGPNNCXB	North Carolina	KSTNNCXA	North Carolina
FRCYNCCE	North Carolina	HGPNNCXC	North Carolina	LBRTNCXA	North Carolina
FRMRNCXA	North Carolina	HGPNNCXD	North Carolina	LCSRNCMA	North Carolina
FRMTNCXA	North Carolina	HGPNNCXE	North Carolina	LCSTNCMA	North Carolina
FROKNCXA	North Carolina	HGPNNCXF	North Carolina	LENRNCHA	North Carolina
FRVLNCXA	North Carolina	HLBHNCXB	North Carolina	LENRNCHU	North Carolina
FRVWNCMA	North Carolina	HLBONCXB	North Carolina	LGRNNCXA	North Carolina
FYVLNCXA	North Carolina	HLDBNCXB	North Carolina	LGWDNCXA	North Carolina
FYVLNCXB	North Carolina	HLFXNCXA	North Carolina	LKLRNCCE	North Carolina
FYVLNCXD	North Carolina	HLRGNCXA	North Carolina	LKWCNCXA	North Carolina
FYVLNCXF	North Carolina	HMBRNCXA	North Carolina	LLTNNCXA	North Carolina
FYVLNCXG	North Carolina	HMLTNCMA	North Carolina	LLVLNCXA	North Carolina
GBSNNCMA	North Carolina	HNSNNCXA	North Carolina	LMTNNCMA	North Carolina
GBVLNCXA	North Carolina	HNVLNCCH	North Carolina	LNBNHCMA	North Carolina
GFTNNCXA	North Carolina	HNVLNCED	North Carolina	LNNGNCXA	North Carolina
GLBONCAD	North Carolina	HNVLNCMI	North Carolina	LNTNNCMA	North Carolina
GLBONCMA	North Carolina	HRBGNCXA	North Carolina	LNTNNCVA	North Carolina
GLCKNCXA	North Carolina	HRFRNCXA	North Carolina	LOMXNCXA	North Carolina
GLDSNCXA	North Carolina	HRFRTNMA	North Carolina	LRBGNCMA	North Carolina
GNBONCAP	North Carolina	HRLSNCXA	North Carolina	LRHLNCXA	North Carolina
GNBONCAS	North Carolina	HRMYNCXA	North Carolina	LSBGNCXA	North Carolina
GNBONCEU	North Carolina	HRNGNCXA	North Carolina	LSBNNCXA	North Carolina
GNBONCHO	North Carolina	HSVLCNCE	North Carolina	LTMRNCCE	North Carolina
GNBONCLA	North Carolina	HTSPNCXA	North Carolina	LTTNNCXA	North Carolina
GNBONCMC	North Carolina	HVLCNCXA	North Carolina	LUCMNCXA	North Carolina
GNBONCPG	North Carolina	HYVLNCXA	North Carolina	LVCRNCXA	North Carolina
GNHMMNCMA	North Carolina	IJAMNCXA	North Carolina	LWDLNCCE	North Carolina
GNVLNCXA	North Carolina	INTRNCXA	North Carolina	LWLLNCMA	North Carolina
GNVLNCXB	North Carolina	JCVLNCXA	North Carolina	LWVLNCXA	North Carolina
GRCKNCXA	North Carolina	JCVLNCXB	North Carolina	LXTNNCXA	North Carolina
GRCYNCXA	North Carolina	JKCKNCXA	North Carolina	LXTNNCXB	North Carolina
GRFLNCXA	North Carolina	JULNNCMA	North Carolina	LXTNNCXC	North Carolina
GRQYNCXA	North Carolina	KDHLNCXA	North Carolina	LXTNNCXD	North Carolina
GSCCKNCXA	North Carolina	KDHLNCXB	North Carolina	LXTNNCXE	North Carolina
GSTANCDA	North Carolina	KGMTNCMA	North Carolina	MADNNCCE	North Carolina
GSTANCSO	North Carolina	KINGNCXA	North Carolina	MAMINCXA	North Carolina
GTTWNCXA	North Carolina	KLLYNCXA	North Carolina	MANTNCXA	North Carolina
GWPRNCXA	North Carolina	KNDLNCCE	North Carolina	MARNNCXB	North Carolina
HAYSNCXA	North Carolina	KNISNCXA	North Carolina	MDSNNCXA	North Carolina
HCKRNCXA	North Carolina	KNLYNCXA	North Carolina	MEBNNCXA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MGTNNCGL	North Carolina	OLIVNCXA	North Carolina	RRHLNCXA	North Carolina
MGTNNCGR	North Carolina	OLTWNCXA	North Carolina	RSBONCXA	North Carolina
MGVANCCE	North Carolina	ORNTNCXA	North Carolina	RSHLNCXA	North Carolina
MHVLNCXA	North Carolina	OXFRNCXA	North Carolina	RWLDNCMA	North Carolina
MIVLNCXA	North Carolina	PCLDNCXA	North Carolina	RXBONCXA	North Carolina
MKVLNCXA	North Carolina	PCVLNCXA	North Carolina	SALDNCXA	North Carolina
MLBYNCXB	North Carolina	PIVLNCXB	North Carolina	SBRDNCXA	North Carolina
MNPLNCXA	North Carolina	PKHLNCXA	North Carolina	SCHLNCHA	North Carolina
MNTINCMA	North Carolina	PKTNNCXA	North Carolina	SCHLNCMA	North Carolina
MONRNCXA	North Carolina	PLMTNCXA	North Carolina	SCVLNCXA	North Carolina
MOYCNCXA	North Carolina	PMBRNCCE	North Carolina	SEGVNCXA	North Carolina
MOYCNCXB	North Carolina	PNBLNCXA	North Carolina	SELMNCMA	North Carolina
MRBGNCXA	North Carolina	PNHRNCXA	North Carolina	SESDNCXB	North Carolina
MRCYNCXA	North Carolina	PNTPNCXA	North Carolina	SEVRNCXA	North Carolina
MRHLNCXA	North Carolina	PNTWNCXA	North Carolina	SGGVNCXA	North Carolina
MRPHNCXB	North Carolina	PRTNNCXA	North Carolina	SHFRNCXA	North Carolina
MRSHNCXA	North Carolina	PSGHNCXA	North Carolina	SHLBNCMA	North Carolina
MRVINCXA	North Carolina	PTBONCXA	North Carolina	SHLHNCXA	North Carolina
MRVNNCXA	North Carolina	PYWDNCXA	North Carolina	SHLSNCXA	North Carolina
MSHLNCXA	North Carolina	QKGPNCXA	North Carolina	SHLTNCXA	North Carolina
MTARNCXA	North Carolina	RAFDNCXA	North Carolina	SLBRNCMA	North Carolina
MTGLNCXA	North Carolina	RCHMNCMA	North Carolina	SLCYNCXA	North Carolina
MTHLNCMA	North Carolina	RCLDNCXA	North Carolina	SLVLNCXA	North Carolina
MTHWNCXB	North Carolina	RCMTNCXA	North Carolina	SMFDNCXA	North Carolina
MTOLNCCE	North Carolina	RCMTNCXB	North Carolina	SMNTNCXA	North Carolina
MTVWNCXA	North Carolina	RDBSNCXA	North Carolina	SNBYNCXA	North Carolina
MXTNNCXA	North Carolina	RDSPNCXA	North Carolina	SNFRNCXA	North Carolina
MYVLNCXA	North Carolina	RDVLNCMA	North Carolina	SNFYNCXA	North Carolina
NRLNNCXA	North Carolina	RDVLNCSI	North Carolina	SNHLNCXA	North Carolina
NRWDNCXA	North Carolina	REDSNCXA	North Carolina	SNRGNCXA	North Carolina
NSVLNCXA	North Carolina	RFFNNCMA	North Carolina	SOPTNCCE	North Carolina
NTCKNCXA	North Carolina	RLGHNCDU	North Carolina	SORVNCXA	North Carolina
NWBONCXA	North Carolina	RLGHNCGA	North Carolina	SPNSNCXA	North Carolina
NWBRNCXA	North Carolina	RLGHNCGL	North Carolina	SPPNNCMA	North Carolina
NWGVNCXA	North Carolina	RLGHNCHO	North Carolina	SPRHNCXA	North Carolina
NWHPNCXA	North Carolina	RLGHNCJO	North Carolina	SPRTNCXA	North Carolina
NWLDNCCE	North Carolina	RLGHNCMO	North Carolina	SRFDNCCE	North Carolina
NWLNNCXA	North Carolina	RLGHNCSE	North Carolina	SSVLNCJE	North Carolina
NWPTNCXA	North Carolina	RLGHNCSI	North Carolina	SSVLNCMA	North Carolina
NWSLNCXA	North Carolina	RMSRNCXA	North Carolina	STBGNCXA	North Carolina
NWTNNCMA	North Carolina	RNMNNCXA	North Carolina	STMLNCXA	North Carolina
OKBONCXA	North Carolina	RNRPNCXA	North Carolina	STNLNCCE	North Carolina
OLFTNCXA	North Carolina	RRGPNCXA	North Carolina	STPLNCXA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
STPNNCMA	North Carolina	WLLCNCXA	North Carolina
STRDNCXA	North Carolina	WLMGNCFO	North Carolina
STVLNCXA	North Carolina	WLMGNCLE	North Carolina
SWNNNCMA	North Carolina	WLMGNCWI	North Carolina
SWNSNCXA	North Carolina	WLSNNCXA	North Carolina
SWNSNCXB	North Carolina	WNDLNCPI	North Carolina
SXPHNCMA	North Carolina	WNGTNCXA	North Carolina
SXRNNCXA	North Carolina	WNSLNCAR	North Carolina
SYVLNCXA	North Carolina	WNSLNCCL	North Carolina
TBCYNCXA	North Carolina	WNSLNCFI	North Carolina
THVLNCXA	North Carolina	WNSLNCGL	North Carolina
TMLKNCXA	North Carolina	WNSLNCLE	North Carolina
TPISNCXA	North Carolina	WNSLNCVI	North Carolina
TRBONCXA	North Carolina	WNSLNCWA	North Carolina
TRENNCXA	North Carolina	WNSLNCWH	North Carolina
TRMNNCMA	North Carolina	WRSWNCXA	North Carolina
TROYNCXA	North Carolina	WRTNNCXA	North Carolina
TRYNNCXA	North Carolina	WSFDNCXA	North Carolina
TYVLNCMA	North Carolina	WVVLNCXA	North Carolina
UNGVNCXB	North Carolina	WXHWNCXA	North Carolina
VASSNCXA	North Carolina	WYVLNCMA	North Carolina
VLDSNCXA	North Carolina	YDVLNCXA	North Carolina
VNBONCXA	North Carolina	ZBLNNCCE	North Carolina
WASHNCXA	North Carolina		
WATGNCXA	North Carolina		
WAVSNCXA	North Carolina		
WDBONCXA	North Carolina		
WDVLNCXA	North Carolina		
WENDNCXB	North Carolina		
WGRMNCXA	North Carolina		
WGVLNCMA	North Carolina		
WHOKNCXA	North Carolina		
WHPNNCXA	North Carolina		
WHTKNCXA	North Carolina		
WHVLNCXA	North Carolina		
WJSNNCXA	North Carolina		
WKFSNCXA	North Carolina		
WKTWNCXA	North Carolina		
WKVLNCXA	North Carolina		
WLCHNCXA	North Carolina		
WLCMNCXA	North Carolina		
WLCVNCXA	North Carolina		
WLDNNCXA	North Carolina		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ZPHYNCA	New Hampshire	GNFDNHMA	New Hampshire	RYBHNHCE	New Hampshire
ALSTNHLI	New Hampshire	GNVLNHAD	New Hampshire	RYMNNHFL	New Hampshire
ANDVNHXA	New Hampshire	HLBONHXA	New Hampshire	SALMNNHB	New Hampshire
ASLDNHHI	New Hampshire	HLLSNHXA	New Hampshire	SBRKNHNR	New Hampshire
ATSNNHMA	New Hampshire	HMPNNHWI	New Hampshire	SBVLNHCS	New Hampshire
BDFRNHAM	New Hampshire	HMPSNHMA	New Hampshire	SLBRNHXA	New Hampshire
BLMTNHMA	New Hampshire	HNDLNHMA	New Hampshire	SNCKNHPA	New Hampshire
BNTONHPR	New Hampshire	HNKRNHXA	New Hampshire	SPFRNHMS	New Hampshire
BRFRNHXA	New Hampshire	HNVNRHSC	New Hampshire	STTNNHXA	New Hampshire
BRNSNHXA	New Hampshire	HRVLNHMA	New Hampshire	SUNPNHMC	New Hampshire
BRSTNHSP	New Hampshire	JCSNNHTH	New Hampshire	TLTNNHPR	New Hampshire
BRTLNHGE	New Hampshire	JFRYNHRI	New Hampshire	TMWONHWH	New Hampshire
BSCWNHXA	New Hampshire	KEENNHWA	New Hampshire	TROYNHPR	New Hampshire
CANDNHDE	New Hampshire	KGTNNHBA	New Hampshire	WEARNHXA	New Hampshire
CHCHNHXA	New Hampshire	LACNNHNM	New Hampshire	WERSNHST	New Hampshire
CHESNHXA	New Hampshire	LBNNNHBA	New Hampshire	WLBNHGS	New Hampshire
CHTWNHBR	New Hampshire	MDSNNHYA	New Hampshire	WLPLNHWP	New Hampshire
CLMTNHBR	New Hampshire	MLFRNHSO	New Hampshire	WLTONHXA	New Hampshire
CMTNNHOW	New Hampshire	MNCHNHCO	New Hampshire	WMLDNHWE	New Hampshire
CNBNNHXA	New Hampshire	MRBONHYA	New Hampshire	WNCHNHMI	New Hampshire
CNCRNHCO	New Hampshire	MRDNNHXA	New Hampshire	WNDSVTPI	New Hampshire
CNHRNHPL	New Hampshire	MRDTNHWA	New Hampshire		
CNOSNHFO	New Hampshire	MRMCNHYA	New Hampshire		
CNTCNHXA	New Hampshire	MTMLNHWE	New Hampshire		
CNTRNHSH	New Hampshire	NASHNHGR	New Hampshire		
CNWNHNYA	New Hampshire	NASHNHWP	New Hampshire		
DBLNNHMO	New Hampshire	NCWYNHKE	New Hampshire		
DNBRNHDB	New Hampshire	NWDRNHXA	New Hampshire		
DNTNNHXA	New Hampshire	NWDSNHMA	New Hampshire		
DOVRNHHT	New Hampshire	NWLNNHXA	New Hampshire		
DRFDNHCC	New Hampshire	NWMRNHGE	New Hampshire		
DRHMNHMC	New Hampshire	NWODNHYA	New Hampshire		
DRRYNHEB	New Hampshire	NWPTNHMA	New Hampshire		
ENFDNHNM	New Hampshire	PLHMNHBR	New Hampshire		
EPNGNHMA	New Hampshire	PLMONHLH	New Hampshire		
EPSMNHBB	New Hampshire	PLSTNHMA	New Hampshire		
EXTRNHCE	New Hampshire	PNCKNHCH	New Hampshire		
FKLNNHFR	New Hampshire	PTFDNHBR	New Hampshire		
FRTNNHMG	New Hampshire	PTMONHIS	New Hampshire		
FTZWNHUT	New Hampshire	PTRBNHCO	New Hampshire		
GFTWNHWH	New Hampshire	RMNYNHSL	New Hampshire		
GLDLNHAB	New Hampshire	RNDGNHCE	New Hampshire		
GLTNNHXA	New Hampshire	ROCHNHWE	New Hampshire		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
WRNRNHXA	New York	BFLONYBA	New York	CHHMNYXA	New York
ADCTNYXA	New York	BFLONYEL	New York	CHKTNYFR	New York
ADMSNYXA	New York	BFLONYFR	New York	CHMGNYXA	New York
AFTNNYXA	New York	BFLONYHE	New York	CHMTNYXA	New York
AKRNNYAK	New York	BFLONYMA	New York	CHPLNYAJ	New York
ALBNNYAI	New York	BFLONYSP	New York	CHPQNYCP	New York
ALBYNYGD	New York	BGFLNYBF	New York	CHTGNYZH	New York
ALBYNYSS	New York	BITNNYXA	New York	CHTQNYXA	New York
ALBYNYWA	New York	BLFSNYBZ	New York	CHVYNYZV	New York
ALDNNYAD	New York	BLLNNYBG	New York	CHZYNXYA	New York
ALFENYXA	New York	BLMTNYBM	New York	CICRNYCJ	New York
ALMDNYXA	New York	BLRVNYBC	New York	CKVLNYXA	New York
ALMTNYAL	New York	BLVLNYXA	New York	CLAYNYOS	New York
AMBRNYAB	New York	BMBGNYXA	New York	CLCNNYCN	New York
AMENNYAN	New York	BMPNNYXA	New York	CLCRNYCC	New York
AMHRNYMP	New York	BNBRNYXA	New York	CLCTNYCC	New York
AMSTNYPE	New York	BNGHNYHY	New York	CLDNNYXA	New York
ANDVNYXA	New York	BNGHNYRO	New York	CLEVNYCE	New York
ANGENYAG	New York	BNVLNYXA	New York	CLNCNYBA	New York
ANGLNYAO	New York	BRDBNYXA	New York	CLPKNYCP	New York
APLCNYXA	New York	BRDTNYXA	New York	CLSPNYXA	New York
ARCDNYAE	New York	BRGNNYXA	New York	CLTNNYZI	New York
ARGYNYAY	New York	BRKRNYBK	New York	CLVLNYCK	New York
ARPTNYAR	New York	BRLNNYXA	New York	CLVRNYCV	New York
ARVGNYAV	New York	BRMVNYXA	New York	CLYDNYCY	New York
ASFKNYXA	New York	BRPTNYBP	New York	CLYMNYXA	New York
ATLNNYXA	New York	BRTNNYXA	New York	CMBRNYCM	New York
ATTCNYAT	New York	BRWDNYBW	New York	CMDNNYZM	New York
ATWPNYAW	New York	BRWSNYBW	New York	CMLSNYID	New York
AUBNNYAU	New York	BSTNNYBN	New York	CMLSNYON	New York
AVOCNYAC	New York	BYRNNYBY	New York	CMMKNYCM	New York
AVONNYXA	New York	BYSHNYBY	New York	CMPBNYCP	New York
AVPKNYAV	New York	CAIRNYCA	New York	CNBRNYCD	New York
AXBANYAX	New York	CANDNYXA	New York	CNDLNYCL	New York
BALSNYBA	New York	CANNNYXA	New York	CNDRNYXA	New York
BATHNYBH	New York	CANSNYCZ	New York	CNGRNYCN	New York
BATVNYBT	New York	CATONYXA	New York	CNJHNYXA	New York
BAVLNYBV	New York	CBLSNYZB	New York	CNSQNYXA	New York
BBYLNYBN	New York	CCVLNYXA	New York	CNSRNYCX	New York
BCPTNYXA	New York	CHBRNYXA	New York	CNSTNYZA	New York
BDVGNYBV	New York	CHCKNYCE	New York	CNTNNYZO	New York
BECNNYBE	New York	CHCNNYXA	New York	CNTTNYCI	New York
BERNNYBR	New York	CHESNYXA	New York	COPKNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
CORFNYXA	New York	DVPLNYDP	New York	FTANNYFA	New York
COTNNY56	New York	DVPTNYDT	New York	FTPLNYXA	New York
CPNHNYZP	New York	DXTRNYXA	New York	FWBGNYXA	New York
CPTWNYZW	New York	EAURNYEA	New York	FYTTNYFY	New York
CPVNNYXA	New York	EDENNYED	New York	FYVLNYFV	New York
CRGHNYXA	New York	EGLVNYGL	New York	GDISNYGI	New York
CRHDNYCH	New York	EGNBNYEG	New York	GENSNYXA	New York
CRLDNYCR	New York	EHTNNYEH	New York	GENVNYGN	New York
CRMLNYCL	New York	ELBANYEB	New York	GLCVNYGC	New York
CRNGNYCG	New York	ELCVNYEV	New York	GLENNYXA	New York
CRNTNYXA	New York	ELDPNYEU	New York	GLFLNYGF	New York
CRNWNYSW	New York	ELTNNYXA	New York	GLVVNYXA	New York
CRTHNYZG	New York	ELVLNYEL	New York	GLWYNYGW	New York
CRVLNYXA	New York	EMIRNYEM	New York	GMTWNYXA	New York
CSDGNYXA	New York	ENDCNYEN	New York	GNBGNYFV	New York
CSPPNYCS	New York	ENPTNYEN	New York	GNWCNYGW	New York
CSTNNYCS	New York	EPMBNYXA	New York	GPTSNYGP	New York
CTBRNYCB	New York	ERCHNYXA	New York	GRCTNYGC	New York
CTCHNYCU	New York	ESPRNYER	New York	GRCYNYGC	New York
CTNGNYCH	New York	ETNANYXA	New York	GRGRNYGG	New York
CTONNYZN	New York	EVMLNYEI	New York	GRLKNYGL	New York
CTRGNYSO	New York	EZTWNYEZ	New York	GRNENYXA	New York
CTSKNYCT	New York	EZVLNYXA	New York	GRNKNYGN	New York
CUBANYEM	New York	FABSNYFB	New York	GRRYNYXA	New York
CXSCNYXA	New York	FAPTNYXB	New York	GRSNNYGA	New York
CYTNNYZY	New York	FILKNYXA	New York	GRTNNYGT	New York
CYVLNYXA	New York	FKLNNYXA	New York	GRVGNYGV	New York
CZNVNYXA	New York	FLBGNYFB	New York	GRVINYGE	New York
DARNNYXA	New York	FLPKNYFP	New York	GSHNNYXA	New York
DBFYNYDF	New York	FLRDNYXA	New York	GSPTNYGP	New York
DELHNYXA	New York	FLSCNYFM	New York	GVRNNYGO	New York
DLGVNYDG	New York	FLTNNYXA	New York	GWNDNYGD	New York
DLMRNYDA	New York	FONDNYXA	New York	HBRTNYHZ	New York
DLSNNYDL	New York	FOPTNYXA	New York	HCVLNYHV	New York
DNKRNYDK	New York	FRDLNYFM	New York	HDFLNYMS	New York
DNMRNYDN	New York	FRDNNYXA	New York	HDSNNYHD	New York
DNSVNYXA	New York	FRHDNYFH	New York	HERMNYXA	New York
DNTNNYXA	New York	FRPTNYFP	New York	HGLDNYHG	New York
DPSTNYXA	New York	FRSHNYFS	New York	HHFLNYHF	New York
DRBYNYDB	New York	FRTNNYXA	New York	HIFLNYHF	New York
DRPKNYDP	New York	FSHKNYLD	New York	HIMLNYXA	New York
DRYDNYXA	New York	FSISNYXF	New York	HLCMNYXA	New York
DSVLNYXA	New York	FSVLNYFL	New York	HLDLNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
HLLDNYHO	New York	KGTNNYKG	New York	MAINNYME	New York
HLLYNYHE	New York	KNBONYXA	New York	MARNNYMR	New York
HLPTNYXA	New York	KNDRNYXA	New York	MARVNYMV	New York
HLTNNYXA	New York	KNDYNYXA	New York	MCDGNYMD	New York
HMBGNYHB	New York	KNVYNYKV	New York	MCGRNYMG	New York
HMBYNYHB	New York	KRHNNYKR	New York	MCHVNYMC	New York
HMLCNYXA	New York	KSVLNYXA	New York	MCLNNYMZ	New York
HMLNNYXA	New York	KTBANYKB	New York	MDLBNYXA	New York
HMPSNYHS	New York	KTNHNYKA	New York	MDLVNYXA	New York
HMPTNYXA	New York	LBRTNYLB	New York	MDPTNYMP	New York
HNBLNYXA	New York	LCPTNYLK	New York	MDRDNYMK	New York
HNCCNYXA	New York	LCSRNYXA	New York	MDTWNYXA	New York
HNDLNYHI	New York	LFRVNYLE	New York	MEDNNYPA	New York
HNRTNYXA	New York	LFYTNYLF	New York	MEXCNYMX	New York
HNSNNYXA	New York	LHSTNYLH	New York	MHPCNYMP	New York
HNSTNYHU	New York	LIVNNYXA	New York	MINLNYMI	New York
HNTRNYHN	New York	LKGRNYLR	New York	MINONYMI	New York
HOFLNYXA	New York	LKKTNYLK	New York	MIVLNYNV	New York
HOMRNYHM	New York	LKPCNYLA	New York	MLBKNYML	New York
HONYNYXA	New York	LKWDNYXA	New York	MLFRNYMU	New York
HPJTNYXB	New York	LMSTNYLM	New York	MLLTNYXA	New York
HRFRNYHR	New York	LNBNYLB	New York	MLTNNYMN	New York
HRKMNYHC	New York	LNCSNYLC	New York	MMRNNYMA	New York
HRNLNYHL	New York	LNGNYLG	New York	MNHSNYMH	New York
HRSNNYHN	New York	LODINYXA	New York	MNLSNYXA	New York
HRSVNYXA	New York	LOWVNYXA	New York	MNTINYMT	New York
HRWKNYHW	New York	LRMTNYLA	New York	MNTKNYMT	New York
HSFLNYHS	New York	LROYNYXA	New York	MNVLNYXA	New York
HSHDNYHH	New York	LSTNNYLW	New York	MONRNYXA	New York
HVTNNYHX	New York	LTFLNYLS	New York	MORSNYXA	New York
HWTNNYXA	New York	LTHMNYTS	New York	MORVNYMO	New York
HYPKNYHK	New York	LTVYNYLI	New York	MRBONYMB	New York
ILINNYIL	New York	LVMNNYLV	New York	MRCCLNYXA	New York
INTRNYXA	New York	LVTWNYLT	New York	MRTNYXA	New York
ITHCNYIH	New York	LXTNNYLX	New York	MRVLNYXA	New York
ITHCNYPG	New York	LYBRNYLB	New York	MSPQNYMP	New York
JAVANYJA	New York	LYCMNYAE	New York	MSSNNYMQ	New York
JHCYNYJC	New York	LYFLNYXA	New York	MSTCNYMC	New York
JHTWNYXA	New York	LYNSNYLY	New York	MSVLNYXA	New York
JMTWNYXA	New York	LYSNNYXA	New York	MTGMNYXA	New York
JNVLNYJV	New York	LYVLNYLL	New York	MTKSNYMK	New York
JRDNNYJD	New York	LZRNNYXA	New York	MTMRNYXA	New York
KENDNYKD	New York	MACDNYMC	New York	MTVRNYMV	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MUNVNYXA	New York	NYCKNYCL	New York	NYCRNYND	New York
MYBKNYXA	New York	NYCKNYFA	New York	NYCRNYNS	New York
MYFDNYXA	New York	NYCKNYFT	New York	NYCRNYSS	New York
MYVLNYXA	New York	NYCKNYKP	New York	NYCRNYWS	New York
NASSNYXA	New York	NYCKNYLA	New York	NYCXNYCI	New York
NCHINYXA	New York	NYCKNYRA	New York	NYCXNYCR	New York
NCHLNYNL	New York	NYCKNYTY	New York	NYCXNYGC	New York
NCLNNYNO	New York	NYCKNYWM	New York	NYCXNYHO	New York
NCLVNYNC	New York	NYCMNY13	New York	NYCXNYJE	New York
NGFLNY76	New York	NYCMNY18	New York	NYCXNYKB	New York
NGFLNYPO	New York	NYCMNY30	New York	NYCXNYMH	New York
NGFLNYWO	New York	NYCMNY36	New York	NYCXNYTB	New York
NGRNNYNG	New York	NYCMNY37	New York	NYCXNYTR	New York
NPLSNYXA	New York	NYCMNY42	New York	OCBHNYOB	New York
NROSNYNR	New York	NYCMNY50	New York	ODSSNYXA	New York
NRVLNYXA	New York	NYCMNY56	New York	OKFDNYOK	New York
NRWCNYXA	New York	NYCMNY73	New York	OKHLNYOH	New York
NRWDNYND	New York	NYCMNY79	New York	OLENNYHA	New York
NSYRNYNS	New York	NYCMNY97	New York	ONEDNYOD	New York
NUNDNYXA	New York	NYCMNYBS	New York	ONNTNYOA	New York
NVVLNYXA	New York	NYCMNYCA	New York	ONTRNYON	New York
NWBRNYNW	New York	NYCMNYMN	New York	ORBGNYOB	New York
NWBRNYWT	New York	NYCMNYTH	New York	ORFLNYXA	New York
NWCYNYNC	New York	NYCMNYVS	New York	ORPKNYST	New York
NWFDNYNF	New York	NYCMNYWA	New York	OSNGNYOS	New York
NWFNNYMA	New York	NYCMNYWS	New York	OSWGNYSO	New York
NWPLNYNP	New York	NYCMNYZO	New York	OTEGNYOT	New York
NWPTNYXA	New York	NYCQNYAS	New York	OTVLNYXA	New York
NWRCNYNR	New York	NYCQNYBA	New York	OVIDNYXA	New York
NWRKNYNK	New York	NYCQNYBH	New York	OWEGNYOW	New York
NWWDNYXA	New York	NYCQNYCO	New York	OWSCNYOO	New York
NWWNNYNW	New York	NYCQNYFH	New York	OXFRNYXA	New York
NYACNYNK	New York	NYCQNYFL	New York	OYBANYOY	New York
NYCKNY14	New York	NYCQNYFR	New York	PANMNYXA	New York
NYCKNY71	New York	NYCQNYHS	New York	PASNYPN	New York
NYCKNY77	New York	NYCQNYIA	New York	PCHGNYPH	New York
NYCKNYAI	New York	NYCQNYJA	New York	PERUNYPE	New York
NYCKNYAL	New York	NYCQNYLI	New York	PGHKNYSH	New York
NYCKNYAR	New York	NYCQNYLN	New York	PGHKNYSP	New York
NYCKNYAU	New York	NYCQNYNJ	New York	PHLANYPF	New York
NYCKNYAY	New York	NYCQNYNW	New York	PHLSNYXA	New York
NYCKNYBR	New York	NYCQNYOP	New York	PHMTNYPM	New York
NYCKNYBU	New York	NYCQNYRH	New York	PHNCNYPH	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
PHNXNYXA	New York	ROCHNYXD	New York	SLSPNYXA	New York
PJSTNYPJ	New York	ROCHNYXE	New York	SLTSNYSL	New York
PKSKNYPS	New York	ROCHNYXF	New York	SMFRNYQM	New York
PLBGNYPB	New York	ROCHNYXG	New York	SMMTNYXA	New York
PLMYNYPY	New York	ROCHNYXH	New York	SMTWNYSM	New York
PLSKNYXA	New York	ROCHNYXJ	New York	SNBRNYXA	New York
PLVLNYPL	New York	ROCHNYXK	New York	SNCKNYXA	New York
PLVWNYPV	New York	RODLNYRD	New York	SNCVNYXA	New York
PNBSNYXA	New York	ROMENYRM	New York	SNFLNYSL	New York
PNFDNYXA	New York	ROSCNYXA	New York	SODSNYSD	New York
PNISNYXA	New York	RPLYNYXA	New York	SPNCNYXA	New York
PNPLNYXA	New York	RSLNNYRO	New York	SPPTNYXA	New York
PNYNPNPN	New York	RSPNNYXA	New York	SPVLNYWM	New York
POMNNYPO	New York	RSVLNYRV	New York	SPVYNYSV	New York
PPRGNYPP	New York	RTJTNYXA	New York	SPWRNYXA	New York
PRDYNYPD	New York	RUVLNYXA	New York	SRLKNYQL	New York
PRISNYPA	New York	RVHDNYRV	New York	SRNCNYQC	New York
PRRVNYNP	New York	RXBYNYRX	New York	SRSPNYSR	New York
PRTVNYPV	New York	RYE NYRY	New York	SSCHNYSO	New York
PRVINYPR	New York	SALMNYSM	New York	SSLMNYSS	New York
PSVLNYPV	New York	SATNNYSN	New York	STATNYXA	New York
PTBYNYXA	New York	SAVNNYSN	New York	STBGNYXA	New York
PTCHNYPC	New York	SBTHNYSB	New York	STJNNYXA	New York
PTHNNYPO	New York	SCDLNYSR	New York	STKTNYSK	New York
PTJRNYXA	New York	SCHNNYSC	New York	STMNNYXA	New York
PTSDNYPS	New York	SCHRNQYH	New York	STNLNYXA	New York
PTTWNYPI	New York	SCHVNYQN	New York	STNVNYST	New York
PTVYNYPY	New York	SCTWNYXA	New York	STTWNYXA	New York
PTWANYPW	New York	SCVLNYXA	New York	SVNHNYXA	New York
PVLNNYXA	New York	SDNYNYXB	New York	SYBHNYQY	New York
PVYDNYPD	New York	SFRNNYSU	New York	SYOSNYSY	New York
PWNGNYSS	New York	SGHRNYSG	New York	SYRCNYDD	New York
RAVNNYXA	New York	SGRTNYSG	New York	SYRCNYEP	New York
RCSPNYRS	New York	SHHMNYSH	New York	SYRCNYGS	New York
RCVLNYRH	New York	SHKNNYSK	New York	SYRCNYJS	New York
RDHKNYXB	New York	SHMNNYXA	New York	SYRCNYSA	New York
REMSNYXA	New York	SHRVNYXA	New York	SYRCNYSU	New York
RHNBNYXA	New York	SHVLNYSV	New York	SYVLNYSA	New York
RNDHNYXA	New York	SKNTNYSE	New York	THRSNYTH	New York
RNKNNYRN	New York	SLCKNYSI	New York	TIVONYXA	New York
RNLKNYRL	New York	SLDNNYSE	New York	TKHONYTU	New York
ROCHNYXB	New York	SLHLNYXA	New York	TLLYNYTY	New York
ROCHNYXC	New York	SLMNNYWW	New York	TMBGNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
TNVLNYTN	New York	WLTWNYXA	New York
TNWNNYTW	New York	WLVLNYNM	New York
TRHLNYXA	New York	WMSNNYWN	New York
TROYNY03	New York	WNDLNYWD	New York
TROYNY04	New York	WNDSNYXA	New York
TRTWNYTT	New York	WNHMNYWM	New York
TUXDNYTX	New York	WNKHNYWK	New York
TXTNNYXA	New York	WNTGNYWT	New York
UNADNYXA	New York	WNTHNYXA	New York
UNSPNYUS	New York	WPFLNYWF	New York
UTICNYUT	New York	WRBGNYWU	New York
UVLONYXF	New York	WRBONYXA	New York
VCTRNYXA	New York	WRCSNYUC	New York
VERNNYXA	New York	WRSWNYXA	New York
VLFLNYVF	New York	WRWKNYXA	New York
VRBGNYVB	New York	WSFDNYXA	New York
VRGLNYXA	New York	WSHVNYXA	New York
VRHVNYVR	New York	WSNCNYUN	New York
WAYNNYXA	New York	WSPTNYXA	New York
WBSTNYXA	New York	WSVLNYNC	New York
WBSTNYXB	New York	WSVYNYXA	New York
WBYNNYWE	New York	WTGLNYWG	New York
WCHZNYXA	New York	WTPTNYWR	New York
WDMRNYFR	New York	WTRLNYWT	New York
WDPTNYWT	New York	WTTWNYUN	New York
WDSTNYWS	New York	WTVLNYXA	New York
WERLNYWL	New York	WVRLNYWV	New York
WHBHNYWB	New York	WWVLNYWW	New York
WHBONYWP	New York	WYLDNYXA	New York
WHLKNYWH	New York	YNKRNYYN	New York
WHPLNYWP	New York	YNTWNYYT	New York
WHPNNYXA	New York	YPHNYYA	New York
WHTHNYUH	New York		
WHVRNYWH	New York		
WLBNNYXA	New York		
WLBONYUB	New York		
WLCTNYWC	New York		
WLDNNYXC	New York		
WLKLNYXA	New York		
WLMGNYXA	New York		
WLSNNYME	New York		
WLTNNYXA	New York		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
YRTWNYTT	Tennessee	CLTNTNMA	Tennessee	GDVLTNMA	Tennessee
ACHLTNMT	Tennessee	CLVLTNMA	Tennessee	GNBOTNXA	Tennessee
ADVLTNXA	Tennessee	CMDNTNMA	Tennessee	GNBRTNMA	Tennessee
ALAMTNXA	Tennessee	CNCRTNXA	Tennessee	GRNBTNMA	Tennessee
ALGDTNXA	Tennessee	CNHMTNMA	Tennessee	GRVLTNXA	Tennessee
APSNTNXA	Tennessee	CNVLTNMA	Tennessee	GTBGTNMT	Tennessee
ARTNTNMT	Tennessee	COVLTNXA	Tennessee	GTWSTNSW	Tennessee
ASCYTNMA	Tennessee	CPHLTNXA	Tennessee	HCRDTNXA	Tennessee
ATHNTNMA	Tennessee	CRHLTNCB	Tennessee	HDLVLTNMA	Tennessee
ATWDTNXA	Tennessee	CRPLTNMA	Tennessee	HIMNTNMA	Tennessee
BCGVTNXA	Tennessee	CRHTNMA	Tennessee	HLBOTNXA	Tennessee
BCTNTNXA	Tennessee	CRVLTNMA	Tennessee	HLLSTNMT	Tennessee
BLCYTNXA	Tennessee	CSVLTNXA	Tennessee	HMBLTNMA	Tennessee
BLGPTNMA	Tennessee	CULKTNMA	Tennessee	HMPNTNXA	Tennessee
BLLSTNMA	Tennessee	CVTNTNMT	Tennessee	HNNGTNMA	Tennessee
BLNCTNMT	Tennessee	CXTNTNXA	Tennessee	HNSNTNMT	Tennessee
BLPLTNXA	Tennessee	DCTRTNMT	Tennessee	HNTGTNMA	Tennessee
BLTNTNXA	Tennessee	DKSNTNMT	Tennessee	HNVTNXA	Tennessee
BNTNTNMT	Tennessee	DNLPTNXA	Tennessee	HRNBTNMT	Tennessee
BRFRTNXA	Tennessee	DNRGTNMA	Tennessee	HTVLTNMA	Tennessee
BRSHTNXA	Tennessee	DOVRTNMT	Tennessee	JCSNTNMA	Tennessee
BRSTTNXA	Tennessee	DRMNTNXA	Tennessee	JCSNTNNS	Tennessee
BRSTTNXB	Tennessee	DRSDTNXA	Tennessee	JFCYTNMA	Tennessee
BRZLTNXA	Tennessee	DYBGTNMA	Tennessee	JHCYTNXC	Tennessee
BTLRTNXA	Tennessee	DYERTNMT	Tennessee	JLLCTNMA	Tennessee
BUVLTNXA	Tennessee	DYTNTNMA	Tennessee	JNBOTNXA	Tennessee
BWVLTNMA	Tennessee	EAVLTNMA	Tennessee	JSPRTNMT	Tennessee
CHHLTNXA	Tennessee	ELTNTNXA	Tennessee	KGPTTNXA	Tennessee
CHRLTNMT	Tennessee	ENWDTNXA	Tennessee	KGPTTNXC	Tennessee
CHTGTNBR	Tennessee	ERWNTNXA	Tennessee	KGTNTNMT	Tennessee
CHTGTNMT	Tennessee	ESSPTNXA	Tennessee	KNTNTNMA	Tennessee
CHTGTNHT	Tennessee	ETWHTNMT	Tennessee	KNVLTNBE	Tennessee
CHTGTNMV	Tennessee	FIVLTNMA	Tennessee	KNVLTNFC	Tennessee
CHTGTNNS	Tennessee	FKLNTNCC	Tennessee	KNVLTNMA	Tennessee
CHTGTNRB	Tennessee	FKLNTNMA	Tennessee	KNVLTNWH	Tennessee
CHTGTNSE	Tennessee	FLBRTNXA	Tennessee	KNVLTNHY	Tennessee
CHTGTNM	Tennessee	FLVLTNMA	Tennessee	LBNNTNMA	Tennessee
CHTNTNMT	Tennessee	FRDNTNMA	Tennessee	LBVLTNXA	Tennessee
CKVLTNXA	Tennessee	FRSHTNXA	Tennessee	LFLTNTNMA	Tennessee
CLDGTNMA	Tennessee	FRVWTNMT	Tennessee	LFYTTNXA	Tennessee
CLDLTNXA	Tennessee	FYVLTNMA	Tennessee	LKCYTNMA	Tennessee
CLEVTNMA	Tennessee	GALLTNMA	Tennessee	LMSTTNXA	Tennessee
CLMATNMA	Tennessee	GBSNTNMT	Tennessee	LNCYTNMA	Tennessee

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
LODNTNMA	Tennessee	MTJLTNXA	Tennessee	RDGLTNMA	Tennessee
LTHMTNXA	Tennessee	MTRYTNXA	Tennessee	RKWDTNMA	Tennessee
LVRGTNXA	Tennessee	MYVLTNMA	Tennessee	RNMTTNXA	Tennessee
LWBGTNMA	Tennessee	NIOTTNXA	Tennessee	RPLYTNMA	Tennessee
LXTNTNMA	Tennessee	NLVLTNXA	Tennessee	RRVLTNMA	Tennessee
LYBGTNMT	Tennessee	NRRSTNMA	Tennessee	RSMRTNXA	Tennessee
LYLSTNMA	Tennessee	NSVLTNAP	Tennessee	RTLGTNXA	Tennessee
LYVLTNMA	Tennessee	NSVLTNBH	Tennessee	SANGTNMT	Tennessee
MARTTNXA	Tennessee	NSVLTNBV	Tennessee	SDDSTNMA	Tennessee
MASNTNXA	Tennessee	NSVLTNBW	Tennessee	SEWNTNMW	Tennessee
MAVLTNMA	Tennessee	NSVLTNCD	Tennessee	SHFRTNXA	Tennessee
MCBGTNXA	Tennessee	NSVLTNCH	Tennessee	SHRNTNXA	Tennessee
MCWNTNMT	Tennessee	NSVLTNDO	Tennessee	SHVLTNMA	Tennessee
MDVITNMT	Tennessee	NSVLTNHH	Tennessee	SHVYTNXA	Tennessee
MDWYTNXA	Tennessee	NSVLTNIN	Tennessee	SIDNTNXA	Tennessee
MEDNTNMA	Tennessee	NSVLTNMC	Tennessee	SLGRTNXA	Tennessee
MGTNTNXA	Tennessee	NSVLTNMT	Tennessee	SLMRTNMT	Tennessee
MILNTNMA	Tennessee	NSVLTNST	Tennessee	SMVLTNXA	Tennessee
MMPHTNBA	Tennessee	NSVLTNUN	Tennessee	SMYRTNMA	Tennessee
MMPHTNCK	Tennessee	NSVLTNWC	Tennessee	SNTFTNMA	Tennessee
MMPHTNCT	Tennessee	NSVLTNWM	Tennessee	SNTNTNXA	Tennessee
MMPHTNEL	Tennessee	NWBRTNMA	Tennessee	SNVLTNMA	Tennessee
MMPHTNFR	Tennessee	NWJHTNXA	Tennessee	SOVLTNMT	Tennessee
MMPHTNGT	Tennessee	NWPTTNMT	Tennessee	SPBGTNMA	Tennessee
MMPHTNHP	Tennessee	NWTZTNXA	Tennessee	SPCYTNMT	Tennessee
MMPHTNMA	Tennessee	OKDLTNXA	Tennessee	SPFDTNMA	Tennessee
MMPHTNMT	Tennessee	OKRGTNMT	Tennessee	SPHLTNMT	Tennessee
MMPHTNOA	Tennessee	OLHCTNMA	Tennessee	SPRTTNXA	Tennessee
MMPHTNST	Tennessee	OLSPTNMA	Tennessee	SRVLTNMA	Tennessee
MMRLTNXA	Tennessee	OLTWTNXA	Tennessee	STCKTNXA	Tennessee
MMVLTNXA	Tennessee	OLZITNXA	Tennessee	SVVLTNMT	Tennessee
MNCHTNMA	Tennessee	ONEDTNXA	Tennessee	SWTWTNMT	Tennessee
MNFDTNXA	Tennessee	PLHLTNXA	Tennessee	TANSTNXA	Tennessee
MNPLTNMA	Tennessee	PLHMTNXA	Tennessee	TLLHTNMA	Tennessee
MOSHTNXA	Tennessee	PLMYTNMA	Tennessee	TLPLTNXA	Tennessee
MRBOTNMA	Tennessee	PLSKTNMA	Tennessee	TPVLTNMA	Tennessee
MRCYTNXA	Tennessee	POWLTNXA	Tennessee	TRCYTNXA	Tennessee
MRTWTNMA	Tennessee	PRSSTNXA	Tennessee	TRINTNMA	Tennessee
MSCTTNMT	Tennessee	PRYRTNXA	Tennessee	TRMBTNXA	Tennessee
MSCWTNMA	Tennessee	PSVWTNMT	Tennessee	TROYTNMT	Tennessee
MSHLTNXA	Tennessee	PTLDTNMA	Tennessee	TRTNTNMA	Tennessee
MTCYTNXA	Tennessee	PTRSTNXA	Tennessee	TTSPTNXA	Tennessee
MTEGTNXA	Tennessee	RCVLTNXA	Tennessee	TWNSTNMA	Tennessee

<u>WC Code</u>	<u>State</u>
UNCYTNMA	Tennessee
UNVLTNXA	Tennessee
VIOLTNXA	Tennessee
VONRTNXA	Tennessee
WHBLTNMT	Tennessee
WHHSTNMA	Tennessee
WHPITNMA	Tennessee
WHVLTNMT	Tennessee
WHWLTNMA	Tennessee
WLPTTNMA	Tennessee
WNCHTNMA	Tennessee
WRTRTNMT	Tennessee
WSBNTNXA	Tennessee
WTTWTNMA	Tennessee
WVRLTNMT	Tennessee
YRVLTNXA	Tennessee

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABNGVAXA	Virginia	CLHGVACO	Virginia	GRFLVAGF	Virginia
ALBRVAXA	Virginia	CLMTVAXA	Virginia	GTCYVAXA	Virginia
ALXNVAAD	Virginia	CLPPVACU	Virginia	GVTNVAGR	Virginia
ALXNVAAAX	Virginia	CLPPVAGR	Virginia	HAYSVAXA	Virginia
ALXNVABA	Virginia	CLPPVALI	Virginia	HCKRVAXA	Virginia
ALXNVABR	Virginia	CLPPVARV	Virginia	HLBOVAHB	Virginia
ALXNVACN	Virginia	CMLDVACU	Virginia	HLLDVAXA	Virginia
ALXNVAFR	Virginia	CNCTVACT	Virginia	HMPNVAAB	Virginia
ALXNVAMV	Virginia	CNVIVACT	Virginia	HMPNVADC	Virginia
AMELVAXA	Virginia	CPCHVACC	Virginia	HMPNVAQN	Virginia
ARCLVAXA	Virginia	CPRNVAXA	Virginia	HMPNVAWD	Virginia
ARTNVAAR	Virginia	CREWVAXA	Virginia	HMSYVAXA	Virginia
ARTNVACK	Virginia	CRLDVAXA	Virginia	HNVRVAXA	Virginia
ARTNVACY	Virginia	CRTDVAXA	Virginia	HPWLVAHW	Virginia
ARTNVAFC	Virginia	DAWNVAXA	Virginia	HRNDVADU	Virginia
ASBNVAAS	Virginia	DHLGVAXA	Virginia	HRNDVAHE	Virginia
ASLDVAAS	Virginia	DLCYVAXA	Virginia	HRNDVAST	Virginia
BCKNVABC	Virginia	DLLSVAXA	Virginia	HRWDVAHW	Virginia
BCRGVAXA	Virginia	DMSCVAXA	Virginia	HYMRVAXA	Virginia
BCWDVAXA	Virginia	DNWDVADW	Virginia	INHLVAXA	Virginia
BEVLVABV	Virginia	DRVRVADR	Virginia	IVORVAXA	Virginia
BKBGVABB	Virginia	DSPAVAXA	Virginia	IVTNVAXA	Virginia
BLCVAXA	Virginia	DSWLVAXA	Virginia	JRRTVAXA	Virginia
BLMTVABM	Virginia	DTVLVAXA	Virginia	KGGRVAXA	Virginia
BOYCVABY	Virginia	EMPRVAXA	Virginia	KGQNVAXA	Virginia
BRDNVAXA	Virginia	EPFKVAXA	Virginia	KGWLVAXA	Virginia
BRSTVAXA	Virginia	ETVLVAEV	Virginia	KNBRVAXA	Virginia
BRVLVAXA	Virginia	EXMRVAEX	Virginia	LACRVAXA	Virginia
BTHIVABT	Virginia	FIFEVAFI	Virginia	LBNNVARD	Virginia
BVRDVAXA	Virginia	FKLNVAXB	Virginia	LDYSVAXA	Virginia
BWLGVAXA	Virginia	FLCHVAMF	Virginia	LOUSVALU	Virginia
BYTNVAXA	Virginia	FRBGVAFB	Virginia	LRTNVAGU	Virginia
CALVVACA	Virginia	FRBGVALH	Virginia	LRTNVAXA	Virginia
CHCYVACC	Virginia	FRFXVABF	Virginia	LRVLVAXA	Virginia
CHESVACR	Virginia	FRFXVAFF	Virginia	LSBGVALB	Virginia
CHKTVAXA	Virginia	FRVLVAXA	Virginia	LVVLVALV	Virginia
CHLHVAXA	Virginia	GCLDVAGO	Virginia	MARNVAXA	Virginia
CHNCVAXA	Virginia	GDSPVAXA	Virginia	MCHVVAMV	Virginia
CHNCVAXB	Virginia	GLCSVAXA	Virginia	MCKYVAMK	Virginia
CHSKVACD	Virginia	GMTRVAXA	Virginia	MCLNVALV	Virginia
CHSKVADC	Virginia	GOVLVAGV	Virginia	MDBGVAMI	Virginia
CHSKVAGU	Virginia	GRBRVAXA	Virginia	MDLTVAMD	Virginia
CLBHVAXA	Virginia	GRBRVAXB	Virginia	MDVWVAXA	Virginia

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MNKNVAMN	Virgina	RCMDVAHR	Virgina	VRBHVASR	Virgina
MNRLVAML	Virgina	RCMDVAHS	Virgina	VRBHVAVB	Virgina
MNSSVAXA	Virgina	RCMDVAIT	Virgina	WHOKVAWO	Virgina
MNTRVAXA	Virgina	RCMDVALS	Virgina	WHVLVAWH	Virgina
MRSHVAMA	Virgina	RCMDVAPE	Virgina	WKFDVAXA	Virgina
MTHWVAXA	Virgina	RCMDVAPS	Virgina	WLBGVAWM	Virgina
MTPLVAXA	Virgina	RCMDVARA	Virgina	WLMLVAXA	Virgina
NKVLVAXA	Virgina	RCMDVASN	Virgina	WNSDVAXA	Virgina
NRFLVABL	Virgina	RCMDVASR	Virgina	WRSWVAXA	Virgina
NRFLVABS	Virgina	RCMDVATC	Virgina	WRTNVAWR	Virgina
NRFLVAGS	Virgina	RKVLVARK	Virgina	WSPNVAWP	Virgina
NRFLVAOD	Virgina	RMTNVARE	Virgina	WTRVAVWT	Virgina
NRFLVAOV	Virgina	RSHLVALE	Virgina	WVRLVAWV	Virgina
NRFLVASP	Virgina	RSTNVAFM	Virgina		
NRFLVAWC	Virgina	SALDVAXA	Virgina		
NWNWVAHU	Virgina	SBWKVAXA	Virgina		
NWNWVAHV	Virgina	SFFLVASK	Virgina		
NWNWVAJF	Virgina	SLVLVAXA	Virgina		
NWNWVAND	Virgina	SMFDVAXA	Virgina		
NWNWVAYK	Virgina	SNTNVASS	Virgina		
OCQNVAXA	Virgina	SPFDVASP	Virgina		
OLCHVAXA	Virgina	SPTSVASP	Virgina		
ONNCVAON	Virgina	SRRYVAXA	Virgina		
PCVLVAPV	Virgina	SRVLVASP	Virgina		
PRANVAXA	Virgina	STCKVAXA	Virgina		
PRANVAXB	Virgina	STFRVAXA	Virgina		
PRFRVAPF	Virgina	STHLVAXA	Virgina		
PRKSVAPK	Virgina	THPLVATP	Virgina		
PRSPVAXA	Virgina	TMVLVATV	Virgina		
PTBGVACD	Virgina	TOANVATO	Virgina		
PTBGVAPB	Virgina	TPHNVAXA	Virgina		
PTMOVAHF	Virgina	TRNGVAXA	Virgina		
PTMOVAHS	Virgina	UNVLVAUV	Virgina		
PTRYVAXA	Virgina	UPVLVAUP	Virgina		
PUNGVAXA	Virgina	VARNVAVR	Virgina		
PWHTVAPW	Virgina	VINNVAVN	Virgina		
QNTCVAXA	Virgina	VRBHVACC	Virgina		
QNTNVAQN	Virgina	VRBHVACT	Virgina		
RCMDVACG	Virgina	VRBHVAGN	Virgina		
RCMDVAGK	Virgina	VRBHVAIL	Virgina		
RCMDVAGR	Virgina	VRBHVAIR	Virgina		
RCMDVAGY	Virgina	VRBHVAPT	Virgina		
RCMDVAHL	Virgina	VRBHVARC	Virgina		

EXHIBIT 4

Sample Marketing Material

Sage
TELECOM[®]



MAKE THE RIGHT CALL SWITCH TO SAGE TELECOM

✓ **No Contract**
✓ **No Credit Check**

- **500 ANYTIME MINUTES FOR ONLY \$15.00 PER MONTH***
- **GET AN AFFORDABLE MOBILE PHONE**

PLUS THIS BONUS:
SIGN UP FOR WIRELESS LIFELINE SERVICE AND
GET AN ADDITIONAL 100 MINUTES FREE!

CALL TODAY
866-674-6729

SEE DETAILS ON BACK ▶

Bingham Reception LLP
©2006 Sage Telecom

WE'VE GOT A PLAN FOR YOU CALL TODAY 866-674-6729

We make it affordable for you to get low-cost talk and text through a government assistance program called Lifeline. Now you can keep in touch with your family and friends. Qualified customers simply prepay \$15.00 per month and get 500 anytime talk and text.

HOW TO GET THE DEAL

To qualify for amazing Wireless Lifeline Service, all you have to do is participate in one of the following:

YOU GET A GREAT DEAL MORE INCLUDING:

- FREE Call Waiting
- FREE Caller ID
- FREE Voice Mail
- Nationwide Service

Don't wait. Call today 866-674-6729 to see if you qualify for Wireless Lifeline Service. Sage Telecom Sales Reps are available to take your call.

- Medicaid
- Federal Public Housing Assistance (Section 8)
- Health Benefit Coverage under the Children's Health Insurance Plan (CHIP)
- Low Income Housing Energy Assistance (LIHEAP)
- Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- Tribal TANF
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- Food Distribution Program on Indian Reservations (FDPIR)

You may also qualify if your total household income is at or below the Federal Poverty Guideline.

*Lifeline is a government assistance program, the service, is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. Any person who knowingly makes false statements in order to obtain Lifeline service will be subject to fines or imprisonment or can be barred from the program. 500 minutes can be for either talk or text. Monthly standard rate of \$24.25 will apply until you are certified. Discounted monthly rate of \$15.00 will start upon approval of Federal Lifeline. Payment plans are available for the \$25.00 activation fee that includes selection of a basic mobile phone which is activated and provided ready for use. Mobile phone may be data enabled.

EXHIBIT 5

Sage Lifeline Certification and Re-Certification Forms



FEDERAL LIFELINE CERTIFICATION FORM

Lifeline Information

- Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers.
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

Lifeline Certification Instructions

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and Date of Birth.

Step 2. Indicate How You Qualify for Lifeline. Choose whether you participate in a qualifying program or if your household income falls within the guidelines. You **MUST** send photocopies demonstrating that you participate in the qualifying program or if you qualify based on your household income, you must provide documentation of income that covers one full year. Documentation that does not cover a full year, such as paystubs, the customer must present the same type of documentation covering Three Consecutive Months within the previous twelve months.

Step 3. Determine If You Qualify for Tribal Land. Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lands a customer must reside on Tribal Lands and participate in one of the following programs: Tribally Administered Free School Lunch Program, Tribally Administered Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, Head Start (those meeting income standard), and Bureau of Indian Affairs General Assistance.

Step 4. Certify Customer Eligibility. Each customer must certify, under penalty of perjury, for receiving Lifeline support, by initialing ALL areas under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Supporting Documentation. Don't forget that you must include supporting documentation which can include a copy of an award letter or card in the qualifying program based. Income documentation could include the prior year's state or federal tax return, paycheck stubs for the most recent 3 months, social security statement of benefits, child support document, retirement/pension statement of benefits, unemployment/workmen's compensation statement of benefits, Federal notice letter of participation in General Assistance, and other official document.

Step 7. Send the Certification Form. When completed, you may mail the form to:

Sage Telecom Communications, LLC
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228



FEDERAL LIFELINE CERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May NOT be a P.O. BOX): _____

☐ Please check this box if the above is a Temporary Address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Determine How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household who is receiving the benefits: _____

(#1). I qualify for Lifeline under Program-Based Criteria because I participate in the following program.

Check only ONE box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | |

(#2). I qualify for Lifeline under the Income-Based Criteria because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: _____ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lands (If Applicable, Choose either #1 or #2)

My Tribal ID Number: _____ Check ONE box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I participate in the following tribally administered program.

- | | |
|---|---|
| <input type="checkbox"/> Tribally Administered Free School Lunch Program | <input type="checkbox"/> Tribally Administered Temporary Assistance for Need Families |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Head Start (those meeting income standard) |
| <input type="checkbox"/> Bureau of Indian Affairs General Assistance | |

Step 4. CERTIFY APPLICANT'S ELIGIBILITY

Please Check or Initial All the statements below to certify your eligibility.

I certify, under penalty of perjury, that:

- ____: I meet the income-based or program-based eligibility criteria.
- ____: I must notify Sage within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline support, I am receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- ____: When I move to a new address, I must provide that my new address to Sage within 30 days.
- ____: I acknowledge that a household is eligible to receive only one Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- ____: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- ____: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline benefits, is punishable by law.
- ____: I acknowledge that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify as to my continued eligibility will result in the de-enrollment and termination of my Lifeline benefits pursuant to the Code of Federal Regulation Section 54.405(e)(4).
- ____: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- ____: If I provided a temporary address, I will be required to verify my temporary address every 90 days.
- ____: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give consent to Sage to verify with the National Lifeline Accountability Database my eligibility in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Signature

Printed Name

Date

You may mail the completed Lifeline form to:

Sage Telecom Communications, LLC
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage's Use Only!

Lifeline Certification Approval / Denial _____ Service Order Provisioned By _____ Date _____

Supporting Documentation Provided _____



FEDERAL LIFELINE RECERTIFICATION FORM

Lifeline Information

- All Lifeline subscribers must annually recertify their continued eligibility in the Lifeline program.
- Lifeline is a Federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers (wireline or wireless).
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Failure to recertify will result in being de-enrolled from the program and loss of the Lifeline credits.

Instructions for Completing the Attached Lifeline Recertification Form

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and date of birth.

Step 2. Indicate How You Continue to Qualify for Lifeline. Choose whether you continue to participate in a qualifying program or if your annual household income remains at or below the income guidelines. Please choose Program-Based or Income-Based eligibility, but not both.

Step 3. Determine If You Continue to Qualify for Tribal Lifeline. (If Applicable) Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lifeline service, the applicant must reside on Federally recognized Tribal Land.

Step 4. Certify Customer Eligibility. Each applicant must certify, under penalty of perjury, to receive Lifeline service, by initialing or checking ALL items under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Send in the Certification Form. Upon completion, please mail the completed form to:

Sage Telecom Communications, LLC
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

All steps are required except Step 3 above for processing of your recertification form.

Please send the completed Lifeline Recertification Form to Sage within **30** days upon receipt.



FEDERAL LIFELINE RECERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May NOT be a P.O. BOX): _____

☐ Please check this box if the above address is a temporary address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Indicate How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household receiving the benefits: _____

(#1). I qualify for Lifeline under the Program-Based Criteria because I participate in the following program(s):

Check only ONE box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Low Income Heat Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | |

(#2). I qualify for Lifeline under the Income-Based Criteria because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is:

_____. (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lifeline (If Applicable, Choose either #1 or #2)

My Tribal ID Number is: _____ Check ONE box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I qualify for Tribal Lifeline service as I participate in the following tribally administered program:

- | | |
|---|--|
| <input type="checkbox"/> Tribally Admin Free School Lunch Program | <input type="checkbox"/> Tribally administered Temporary Assistance for Needy Families |
| <input type="checkbox"/> Head Start (those meeting income standards) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) | |

Step 4. CERTIFY APPLICANT'S ELIGIBILITY

Please **Check** or **Initial All** the statements below to certify your continued eligibility.

I certify, under penalty of perjury, that:

- ____: I continue to meet either the income-based or program-based eligibility criteria.
- ____: I must notify Sage within 30 days if, for any reason, I no longer satisfy the criteria for receiving Lifeline including, as applicable, if I no longer meet the income-based or program-based criteria, I am receiving more than one Lifeline service, or another member of my household is receiving a Lifeline service. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- ____: When I move to a new address, I must provide my new address to Sage within 30 days.
- ____: I know that my household is eligible to receive only one Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- ____: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- ____: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline service, is punishable by law.
- ____: I understand that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify my continued eligibility will result in the de-enrollment and termination of my Lifeline service, pursuant to the Code of Federal Regulation 47 Section 54.405(e)(4).
- ____: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- ____: If I provided temporary address, I will be required to verify my temporary address every 90 days.
- ____: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give my consent for Sage to verify with the National Lifeline Accountability Database whether I participate in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form

You must print your name and sign the certification form indicating you are complying with the Lifeline rules.

Signature

Printed Name

Date

You may mail the completed Lifeline form to:

Sage Telecom Communications, LLC
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage's Use Only!

Lifeline Recertification Approval, / Denial _____ Service Order Provisioned By _____ Date _____

Lifeline Participating Program / Income Based Criteria _____

EXHIBIT 6

CTIA Wireless Code

CTIA

Consumer Code *for* Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers, including voice, messaging, and data services sold either on a postpaid or prepaid basis.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, wireless carriers will disclose to consumers at point of sale and on their web sites, at least the following information, as applicable: (a) the coverage area for the service; (b) any activation or initiation fee; (c) the monthly access fee or base charge; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial

period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate domestic coverage applicable to each of their service plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

THREE

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates new service or a change in existing service, the carrier will provide or confirm any new material terms and conditions of the ongoing service with the customer.

FOUR

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

FIVE

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, wireless carriers will disclose material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free;" (l) for any service plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

SIX

SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

SEVEN

PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS

Carriers will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable

advance notice of a proposed modification and allowing those customers a time period of not less than 14 days to cancel their contracts with no early termination fee.

EIGHT

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

NINE

PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

TEN

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online. Each wireless carrier will abide by the CTIA Best Practices and Guidelines for Location-Based Services.

ELEVEN

PROVIDE CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING

Each wireless provider will provide, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Wireless providers will generate the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Each wireless provider shall provide its customers at least two of these alerts by October 17, 2012 and all of these alerts by April 17, 2013. Wireless providers will clearly and conspicuously disclose tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

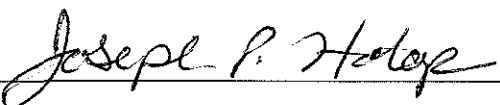
EXHIBIT 7

Officer Affidavit

AFFIDAVIT

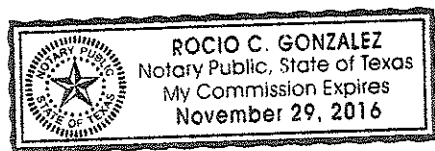
STATE OF TEXAS §
 §
COUNTY OF DALLAS §


1. My name is Joseph P. Holop. I am the Chief Operations Officer of Sage Telecom Communications, LLC, and I am authorized by the company to this verification on their behalf.
2. I swear or affirm that I have personal knowledge of the facts states in the Petition, that I am competition to testify to them, that I have the authority to make this verification on behalf of the company, and that all of the statements and representations made in this Petition are true and correct. I swear or affirm that the company understands and will comply with all requirements of law applicable to the company, and that the company will provide the support services, as applicable, throughout the Designated Service Area as defined in the Petition.



Joseph P. Holop
Chief Operations Officer

SWORN TO AND SUBSCRIBED before me on the 8th day of Aug., 2013.





Notary Public In and For the
State of Texas

My Commission Expires: November 29, 2016